

Review of Programs Involved
With the SR/SFSR
Mercury Issue

Programs Integration Task Team (PITT)

March 14, 2012

The Program Challenge

- Six regulatory and non-regulatory programs
 - RCRA Corrective Action
 - South River Science Team
 - NRDC/Sierra Club Settlement
 - Natural Resource Damage Assessment
 - Benthic and bacteria TMDL
 - Mercury TMDL
- Unique processes and schedules
- “Is there a common remedial approach and implementation that satisfies the requirements / goals of all programs?”

NRDC/Sierra Club Settlement Status

- EcoStudy draft report to be submitted May 2012
- Anticipated final report submission August 2012
- Remediation Program Proposal due ~August 2013

Current Draft Approach - River

1. Control External Loadings
 1. Control Plant loading and monitor
 2. Control significant ongoing loadings from banks / others and monitor
 - Use adaptive implementation (AI) to reduce CSM uncertainty and effectiveness of remedial technologies
 - Approach remedial actions from upstream to downstream in discrete reaches
 - Evaluate remedial alternatives against criteria and potential for unintended consequences (relative risk model)
 - Possibly - use models to help frame scope of actions and time needed for system response for successful monitoring program within AI framework
2. Monitor for Natural Recovery of “internal” sources

Current Draft Approach - Floodplain

- Design and Implement floodplain biochar amendment study
- Continue to explore other treatments
- Explore agricultural and other best practices to reduce Hg loading to the river
- Evaluate options against criteria and potential unintended consequences (relative risk model)
- Implement feasible options in a phased manner and monitor
- Integrate actions with overall watershed vision (including other TMDLs) and explore sustainable implementation through existing programs

TMDL

- Bacteria and Benthic TMDL Development/Implementation
- Mercury TMDL Development
- Mercury TMDL Implementation
 - Point / Non-point waste load allocation
- Implementation Efforts
 - Bank Stabilization Pilot
 - Floodplain Pond Amendment

NRDC

- Fish Consumption / Health Advisories
- Fish Consumption Survey Report
- Ecological Study
- Ecological Study Report
- Notification of Need for Remediation
- Remediation Proposal
- Agreement on Remediation

SRST

- Investigations
 - Habitat and Geophysical
 - Physical and Chemical
 - Biological
- Remedial Options Program
- Remedial Option Selection

Off-Site RCRA – CA

- Facility Assessment
- Risk Assessment – Human Health
- Risk Assessment – Ecological
- Interim Measures
- Corrective Measures Study (CMS)
- CMS Implementation

NRDA

- Pre-Assessment Screen
- Assessment Plan
- Assessment Implementation
 - Potential Injury Determination
 - Restoration Determination
- Report of Assessment
- Restoration Implementation