Newtown Creek Superfund Site
Community Advisory Group Meeting
October 30, 2019

Remedial Investigation

- **Overall objectives**
  - To characterize the nature and extent of contamination throughout the Creek
  - To support the Feasibility Study (FS)
- **Major components**
  - Field investigations
  - Sample analysis and data validation/evaluation
  - Evaluate nature and extent of contamination
  - Conduct human health and ecological risk assessments
  - Undertake complex modeling
  - Develop a Conceptual Site Model (CSM)
  - Remedial investigation report

Draft Remedial Investigation Report

- **Second Draft Remedial Investigation (RI) Report submitted to EPA by NCG Respondents in April 2019**
  - EPA submitted comments on Second Draft RI report to NCG on September 19, 2019
  - NCG preparing response to comments matrix for discussion with EPA

- EPA provided the CAG with a copy of the Executive Summary on June 19, 2019

EPA General Comments on Draft RI Report (4/19)

- **Selection of Contaminants for In-Depth Evaluation**
  - Evaluation and discussion of additional contaminants beyond TPAHs, TPCBs, and Cu is needed
  - Discussion of the properties and distribution of additional contaminants in all relevant site media (subsurface sediment, porewater, groundwater, and surface water)
  - Risk assessments to focus on those contaminants that are present at concentrations that pose an unacceptable risk to human health or the environment

EPA General Comments on Draft RI Report (4/19)

- **Background**
  - References to background discussed in the report have not been defined, and site-specific background concentrations have not yet been determined
  - Still a topic of active discussion
- **Feasibility Study and Risk Management**
  - RI should not draw conclusions that are under the purview of the FS or provide statements regarding items to be considered in future risk management decisions

EPA General Comments on Draft RI Report (4/19)

- **Lateral Groundwater Discharge loading**
  - Lateral groundwater-borne contaminant loadings should not be ruled out solely based on the evidence currently provided in the RI
  - FS-based contaminant fate and transport (CF&T) modeling will evaluate shallow lateral groundwater-borne contaminant loadings

EPA General Comments on Draft RI Report (4/19)

- **Sources – Sediment COPC Attribution**
  - Report focuses too much on the contribution of combined sewer overflows (CSOs) and municipal separate storm sewer systems (MS4s) on sediment concentrations of COPCs
  - Report does not sufficiently discuss the contribution of other current and historical sources to sediment contaminant concentrations
  - Contaminant concentrations measured in sediments reflect contributions from multiple sources

EPA General Comments on Draft RI Report (4/19)

- **Non-Aqueous Phase Liquid (NAPL) Seeps and Sheens**
  - The report acknowledges that NAPL seeps have been observed near bulkheads and spills and that other discharges have occurred at the creek
  - Seeps represent a potential ongoing source of contamination to the creek and should be discussed in the report
  - Other portions of the report do not discuss sheens equally with NAPL

EPA General Comments on Draft RI Report (4/19)

- **Potential Unidentified Sources**
  - Potential exists, as it does for all sites, for some sources to remain unidentified following RI/FS activities
  - The report should acknowledge this, and state that this concern will be addressed during the remedial design
- **CSM**
  - The data and information provided in the RI Report were used to develop and refine the current CSM
  - The CSM will continue to be revised and updated as more data and information become available through the RI/FS process