Carson River Mercury Superfund Site Operable Unit 2 Update Feasibility Study Overview

Carson Water Subconservancy District November 30, 2018 Carson City, NV



2 Carson River Mercury Site Team

- U.S. Environmental Protection Agency (EPA)
- Nevada Division of Environmental Protection (NDEP)
- Fallon Paiute Shoshone Tribe (FPST)







Topics

3

- Superfund Process
- Contamination at the Carson River Mercury Site (CRMS)
- Feasibility Study
 - Update Human Health risk assessment
 - > Technology Review
 - Develop Remedial Alternatives
- Next steps
 - Proposed Plan, Administrative Record and Public Comment
 - > Record of Decision



The Superfund Process





















Preliminary Assessment / Site Inspection



Placement on the National Priorities List (NPL)



Remedial Investigation (RI)

Eco and Human Health Risk Assessment



Feasibility Study (FS)



Proposed Plan (PP)



Record of Decision (ROD)



Remedial Design (RD)



Remedial Action (RA)



Long-Term Operations & Maintenance (O&M)



Community involvement and planning for a site's future reuse



are Integral parts of the entire process.

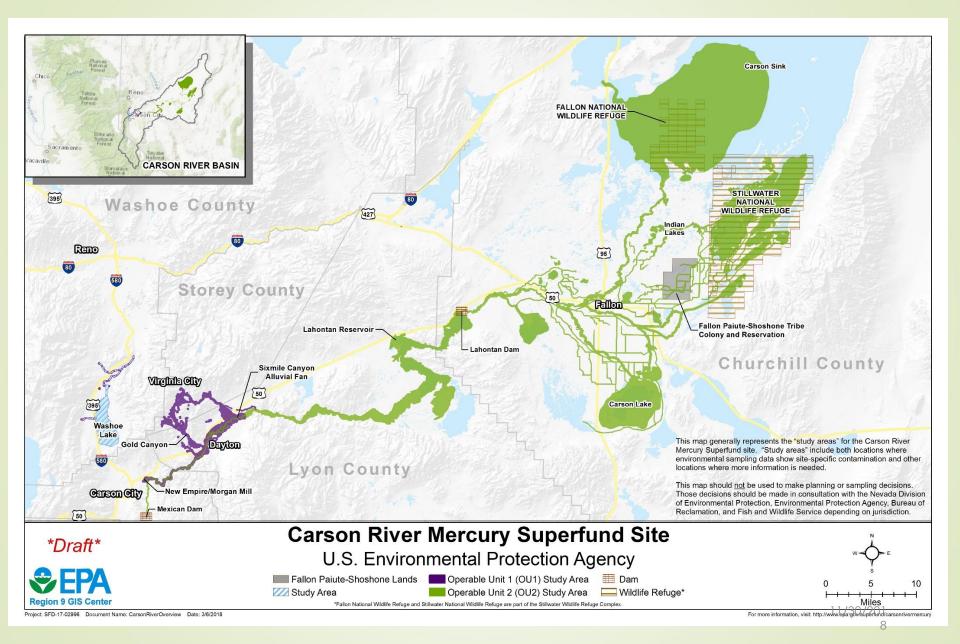
Government to Government Tribal Consultation

Operable Units

Superfund sites are large and complex. Often, we divide sites into smaller, more manageable projects called operable units (OUs). CRMS Site has two OUs:

- 1. Upland/Source Areas
- River channel including floodplain, sediments, and biota (divided into four subareas)





Superfund Milestones - Carson River Site

7

1860's – mercury contamination from Comstock-era mills

1990 – Superfund National Priorities List, initial removals

1992 – EPA studies begin on Operable Unit 1 (source) and OU2 (river/lakes)

1995 - OU1 Record Of Decision (ROD) signed

1999 – cleanup of five yards in Dayton and one in Silver City

2000-2013 surface water, banks & sediment studies

2014 – bilingual health advisory signs at Lahontan Reservoir, Washoe Lake and access points along the river.

2015 – additional OU2 fieldwork

2017 – Remedial Investigation and risk assessment released

2018 – updated the Long-Term Sampling and Response Plan (LTSRP)



Carson River OU2 Process

The final remedial investigation report issued April 2017:

- wealth of existing data informed the risk assessment
- completed map coverage
- identified obvious datagaps
- coordinated with State,
 Tribes, local and Federal government experts
 throughout process
- informed the community



8



Contamination - Carson River OU2

Remedial investigation (RI) findings:

- Estimated 7,500 tons of mercury was lost to the environment during Comstock era
- Mercury is deep in the old channels, but released during river bank erosion or construction from meander scars (1997)
- 1997 flood transferred contaminated sediments <u>from the OU2a to OU2b area</u>, with little impact to the river reaches beyond the Lahontan Reservoir
- Estimate that 80-90% Hg is trapped in Lahontan Reservoir
- Elemental mercury trapped in river and Reservoir sediments converts to methylmercury (bacteria) through the food chain, reaching extreme levels in sport fish, such as walleye and wiper



9

Results of risk assessment fish, waterfowl and wild plants

Studied mercury exposure from the food-chain

- Eating fish is a serious health risk:
 - Sacramento blackfish commercially harvested and sold at Asian markets
 - child consuming fish from Lahontan Reservoir and up river
 - Tribal lifestyles eating large amounts of fish caught throughout OU2 (although not actually <u>on</u> the Fallon Paiute Shoshone Reservation)
- Eating wild plants and waterfowl is only a human health risk to traditional tribal lifestyles beyond the FPST reservation.





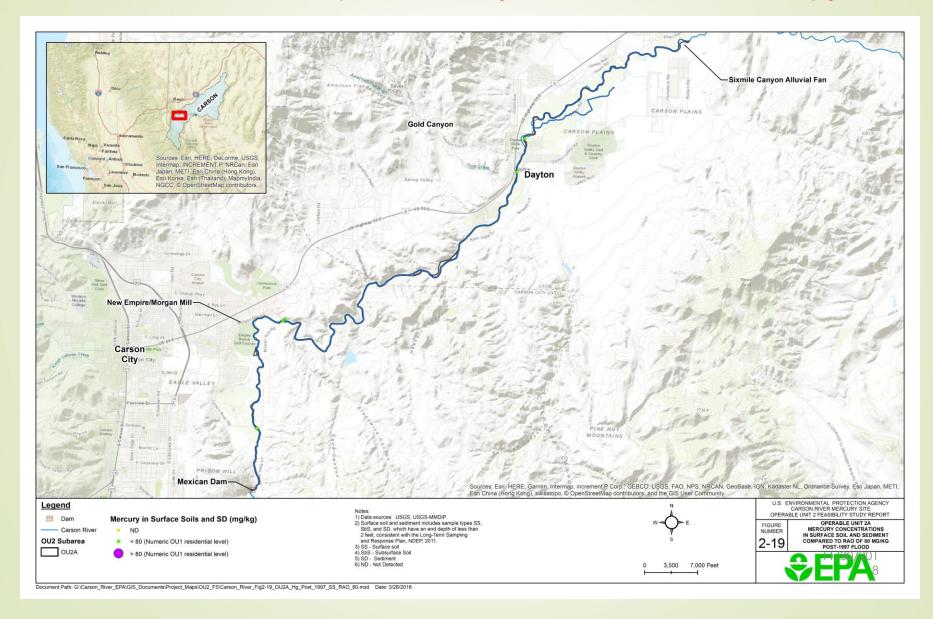
Other risk considerations

- Existing residences in the floodplain <u>may</u>
 be at risk in areas that have not been sampled
- Future development in the floodplain is a potential future risk in areas that have not been sampled

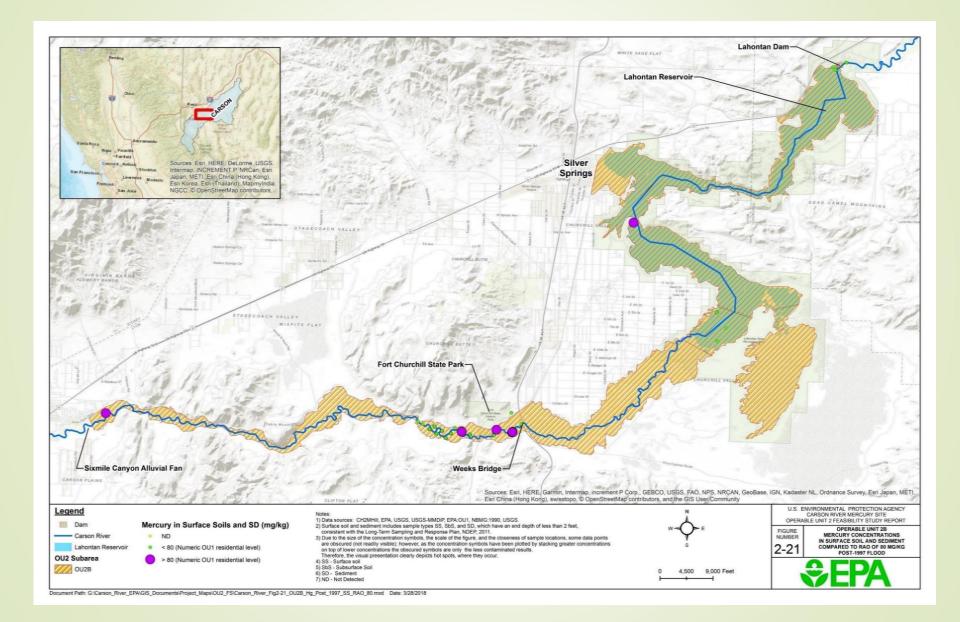




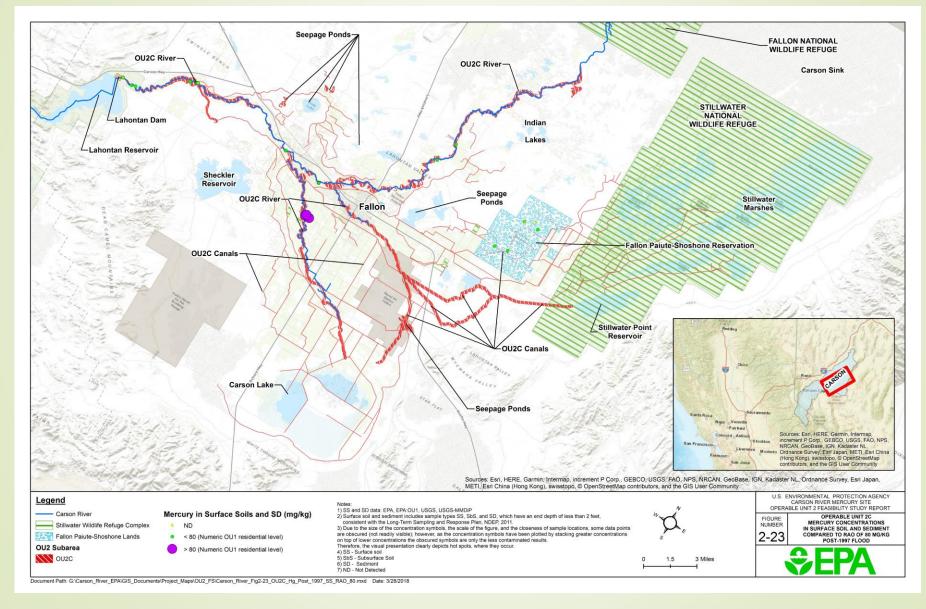
OU2a: Mexican Dam to the eastern edge of Sixmile Canyon fan (river channel only)



13 OU2b: Sixmile Canyon fan to Lahontan Dam



OU2c: Lahontan Dam to terminal wetlands, including canals and drains



Feasibility Study

We evaluated cleanup technologies that could be used to treat contaminated soils/sediments and surface water, including:

- Land Use Controls
- Monitoring
- Containment (capping/barriers and bank stabilization)
- In-situ treatment
- Ex-situ treatment



Technology Review

- Removal (dredging and excavation)
- Disposal
- Beneficial Reuse
- Sediment
 Management





Development of Alternatives

Remedial alternatives were developed from the technologies most suitable to address the site-specific conditions for CRMS OU2. Four remedial alternatives were developed to address risks:

- > Alternative No. 1 No action
- Alternative No. 2 Land use controls (LUCs)/institutional controls (ICs) and Monitoring
- Alternative No. 3 Same as No. 2, plus limited areas of riverbank stabilization with sediment excavation and disposal
- Alternative No. 4 Same as No. 3, plus limited areas of riverbank and river bed removal and disposal



Alternative 1: No action

- No remedial action taken to address risks
- EPA required by law to consider





Alternative 2: Land use controls/institutional controls and monitoring



- No active remediation of the site
- Reduces exposure to risks by managing site activities
- Land use controls:
 - > Fish and wild plant advisories
 - Stop commercial fishing
 - Stop stocking sport fish
 - Wild plant/waterfowl consumption advisories
- Soil sampling and management for construction activities
- monitoring of surface water and sediments
- Implementation will require the active involvement of principal stakeholders





Alternative 3: Limited areas of riverbank stabilization with sediment excavation and disposal, LUCs and monitoring

- Everything in Alternative 2, plus:
 - annual inspections will be performed as part of the long-term monitoring program. The inspections will include identification of areas of new erosion from major flood events or high flow conditions
 - limited areas of riverbank stabilization with sediment excavation and disposal (or beneficial reuse such as road bed construction)
 - stabilization of the riverbank using rock, a vegetative cover, or a combination of rock and vegetative cover as appropriate for location





Alternative 4: Limited areas of riverbank and river bed removal and disposal, riverbank stabilization, LUCs and monitoring



removing limited areas of riverbed to capture contaminated riverbed sediments for permanent removal from the Carson River drainage.

Note: Alternatives 3 and 4 do not apply to the terminal wetlands



What comes next?

- complete the FS report (Dec 2018)
- additional outreach in the Spring
- using the nine CERCLA criteria, determine a preferred remedy plan ("alternative")
- present the Proposed Plan to the public and hold a formal comment period (Fall 2019)
- EPA Record of Decision (remedy plan) and response to comments (2020)
- design the remedy (2021)
- implement remedy (2022)
- outreach, reuse and redevelopment 11/30/201 (ongoing)



23

Teamwork and collaboration



