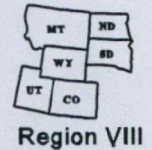




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REGION 8 SUPERFUND TECHNICAL GUIDANCE

No. **ER-01: ETAG for Region 8**

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Ecological Risk (Short Title / Key Words)

TITLE: *Operation of the ETAG (Ecological Technical Assistance Group) for EPA Region VIII Ecological Risk Assessments*

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HAZARDOUS WASTE MANAGEMENT DIVISION, SUPERFUND MANAGEMENT BRANCH, TECHNICAL SECTION

SUMMARY

This Regional guidance is intended to outline the general formation and operation of Region VIII ETAGs (Ecological Technical Assistant Groups) for Superfund ecological risk assessments (ERAs). ETAGs (or alternatively, BTAGs, Biological TAGs) have recently been created throughout EPA at Regional levels to establish an available team of ecologically relevant professionals for consultation and review of EPA ecotoxicological activities. The ETAGs are expected to help EPA achieve better ERAs through consideration of broad-based professional inputs on field sampling designs, population and habitat characterizations, selection of important assessment and measurement endpoints, and interpretations of results. Functional ETAGs should be operated efficiently and should help provide greater scientific credibility, consistency and comparability for EPA ecological risk assessments.

ETAG for Region VIII

PURPOSE

The purpose of the ETAG (Ecological Technical Assistance Group) is to assist EPA remedial project managers (RPMs) in adequately addressing scientific aspects of environmental impacts at hazardous waste sites. It is not intended to serve as a forum through which state and federal agencies formally transmit their concerns or recommendations regarding natural resource trustee (governmental land owners or overseers) issues.

Interactions by RPMs or by other officials with the ETAG do not constitute formal notification to natural resource trustees or the identification of Applicable or Relevant and Appropriate Requirements (ARARs) as required by CERCLA. Separate processes exist for these purposes. However, early involvement and coordination with the trustee agencies by the RPMs, usually through the Regional ETAG, will enhance the efficiency of the remedial process by minimizing repetitious or unnecessary sampling and analysis.

ORGANIZATIONAL FRAMEWORK

ETAG participants can represent a variety of disciplines: wildlife and aquatic biology, toxicology, fisheries, ecology, wetlands, botany, soil science, geology, and hydrology. The Regional ETAGs are usually comprised of representatives from several state and federal agencies as relevant to an EPA site, including: U.S. EPA offices of Superfund and Water or Wetlands and RCRA, U.S. Fish and Wildlife Service and/or U.S. Biological Survey (D.O.I.), Bureau of Land Management, U.S. Geological Service, U.S. Forest Service, State Department of Health, and State Division of Wildlife.

EPA will chair and otherwise manage the ETAG groups, which are planned to be established on a state by state basis as needed in Region 8. The EPA Chair will usually be the Regional Superfund ecotoxicologist or the ETAG Coordinator (if such a position is filled) in the absence of the Chair. Other technical advisors with special expertise may be called upon to participate in scientific

discussions at the discretion of the core ETAG workgroup.

REVIEW AND MEETING PROCESSES

As much as possible ETAG members will only be consulted for pertinent stages of document reviews and to discuss and help resolve key ecotoxicological risk issues. The EPA Regional ETAG Coordinator, or the Chair, will be the contact point for all requests and interactions between RPMs and the ETAG.

To make best use of professionals' limited time for ETAG work, the Coordinator will serve as the interface between RPMs and ETAG members to screen and help prioritize requests for critical reviews. ETAG members should only be involved in productive work that takes advantage of their expertise on items that actually need their professional review and input. Much of that work should be able to be handled through mailings with acceptable timeliness.

The Coordinator will help ensure that reviews are focused on specific critical issues, that the appropriate ETAG members receive complete materials, and that follow-up occurs to get timely receipt

of comments. The Coordinator will work closely with (or at times may fill-in as) the ETAG Chair to manage the ecological activities in a manner that complies with EPA guidance and serves the RPMs.

The ETAG Chair is expected to serve as a liaison with the Regional human health toxicologists on comprehensive risk assessments, ensuring that data sampling and analyses are coordinated between human health and ecological needs (averting redundant or unnecessary sampling and analyses). The ETAG Chair can also assist the RPMs and human health toxicologists place the ERA and BRA into proper balance and perspective for later RI/FS and ROD activities.

EPA will periodically set meeting dates as required to support RPMs' needs, with consideration of ETAG members' schedules and availability. Meetings for the Colorado ETAG will generally be held at the EPA Region 8 Conference Center in downtown Denver. ETAGs set up for other Region 8 States will usually be held at a convenient location in that State.

An agenda will be sent to the group members about one to two weeks prior to a meeting date, along with any site-specific information requiring ETAG

review. Members are encouraged to prepare to discuss review material; if a member is unable to attend a meeting, an informal copy of their comments should be forwarded to the ETAG Coordinator before the meeting. Comments will be distributed at the meeting so that input of all members is considered in the review and recommendations process by the ETAG.

Site managers will be formally notified of the inclusion of their sites in an ETAG meeting, along with the time that the site will be discussed, approximately two weeks prior to the meeting. Unless other sites specifically pertain to their site (e.g., Arkansas River Superfund sites), each site RPM is encouraged to stay only for discussions involving their site.

If the EPA Chair cannot be present at a ETAG meeting, the Coordinator can be designated as the acting Chairperson. If other ETAG members are unable to attend a meeting, they should notify the ETAG Coordinator prior to the meeting and try to arrange for a substitute participant from their Agency. Minutes of the meetings will be taken, filed, and distributed by the ETAG Coordinator or the Chair.

SITE SELECTION

The RPMs are currently responsible for contacting the ETAG, normally through the Coordinator, to request technical assistance on their site. If it is unnecessary for the site to be initially reviewed, because of the nature of the site and its known contaminants, the Coordinator may elect to not bring the site through a formal ETAG review meeting. However, the names of all new sites obtained by the Coordinator that have substantial ecological concerns will be provided periodically (quarterly) to all the ETAG core members in the form of status reports. Any member may request that a new sites be reviewed by the ETAG at a subsequent meeting. Status reports will summarize ERAs by state and the current stage in the EPA Superfund SA/PI, RI/FS (including SACM), and ROD process.

REVIEW MATERIAL

The ETAG Coordinator will obtain a copy of site-specific technical documents/materials from the RPM and ascertain any specific needs of the project manager. The Coordinator will then condense this material, as needed, by copying and distributing only the relevant sections. A

brief overview in a cover letter will be included to direct the ETAG reviewer, stating any specific information or needs that the RPM has requested. Additional detailed sections of EPA reports and data or other relevant information may be requested by contacting the Coordinator. A brief *List of Contents* will be included in the provided package, so that ETAG members can judge if they have been given enough information needed to adequately review the material.

RECOMMENDATIONS PROCESS

The ETAG will provide brief summaries of consolidated site-specific technical recommendations and other comments to the respective EPA project manager after review and discussion of documents or issues presented to the group. If opposing recommendations or comments are provided on the same issue, each will be summarized and forwarded to the RPM with accompanying rationale for each position.

All ETAG recommendations will be compiled by the Coordinator and submitted to the ETAG for a 10-day review before final submission to EPA's project manager. Technical recommendations may be

obtained on any document or issue which the ETAG is requested to review by a Regional EPA site manager. Any recommendations will be from the Region ETAG only and are based on the collective technical expertise of the ETAG; they do NOT constitute "consensus" or individual Agency's comments or policy. Any additional recommendations or comments (especially as they relate to trustee NRDA issues) that a Trustee Agency wishes to present should be addressed to the Region VIII EPA independently from the ETAG.

ETAG recommendations made to RPMs will be directed to the current needs of the site. As new information becomes available or the status of the site significantly changes, the site should be reviewed again by the ETAG. The RPM should consider any recommendations in the overall technical framework of the Superfund remedial process. See Figure 1 below on the ETAG process.

REVISION / REVIEW OF GUIDANCE

This guidance, and any other guidance developed for or by the ETAG, will be reviewed periodically and updated as necessary. Changes to ecotoxicological

technical guidance will be made after discussion and approval by the ETAGs.

REFERENCES

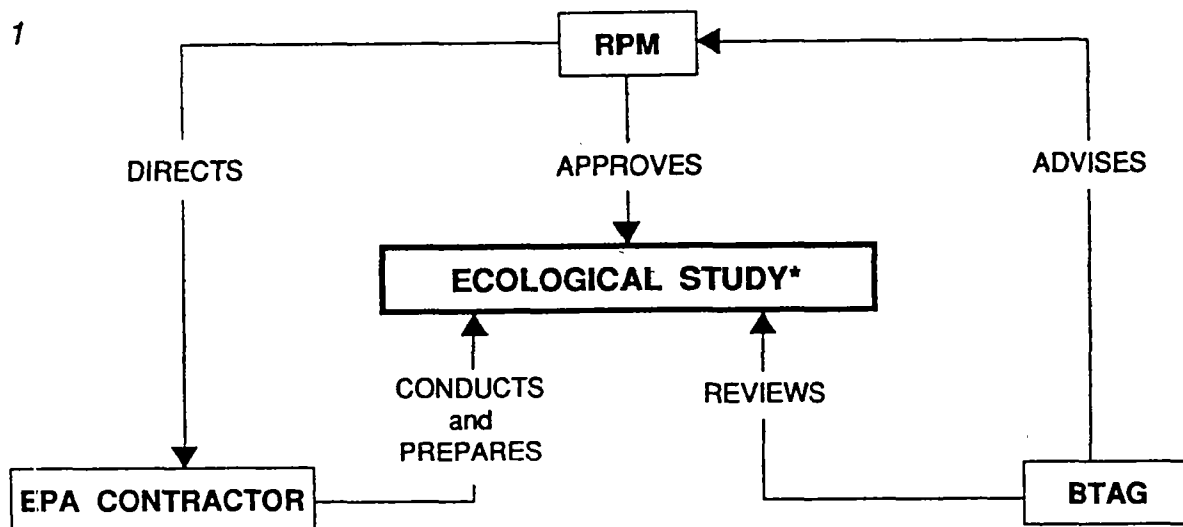
1. Framework for Ecological Risk Assessment, Risk Assessment Forum, EPA/630/R-92/001, February 1992.

2. The Role of BTAGs in Ecological Assessment, ECO Update, OSWER: Pub 9345.0-05I, September 1991.

3. The Role of Natural Resource Trustees in the Superfund Process, ECO Update, OSWER: Pub 9345.0-05I, March 1992.

Who Does What?

Figure 1



* Ecological Study — Includes ecological assessments as part of the baseline risk assessment, ecological studies such as toxicity tests and field studies, evaluation of remedial alternatives, ecological portions of RODs, and ecological plans.