Tar Creek Superfund Site
Technical Assistance Grant
Summary Report

Prepared for Local Environmental Action Demanded (LEAD Agency)

Prepared By Resource Management Int.

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The LEAD Agency's Tar Creek Superfund Site TAG Grant summary and recommendations for future actions:

Reports of what transpired during the 25-year history of the Site were produced. Reports prepared include: OU1 Summary, OU2 Summary,
OU3 Summary, History of the Site, Downstream Impacts, Technical Review, Glossary of Terms, and a Review of Health Data prepared by Dr. John Neuberger.

The key reports indicate a pattern by the EPA and other Agencies that have been involved. This pattern is to perform quite specific or publicly mandated actions at Tar Creek and call them "Operable Units" and with the first actions, name the work an operable unit after the fact. This approach has allowed more than 20 years to pass with no substantial remediation occurring at the Tar Creek Site.

Understanding what has happened at this Site is terribly important to guiding the future work at Tar Creek. To briefly summarize the history at Tar Creek, it was identified early in the Superfund process as one of the most significant Sites in the country. A few very limited number of studies and sampling efforts have occurred. These have resulted in a few minor (but very expensive) remedial efforts.

Efforts so far have not been permanent (as typically required at Superfund Sites) nor have they resulted in the resolution of a single aspect of the Site's problems. Effectiveness of the work done in Operable Unit 2 will be measured in the future by the blood lead levels of area children.

There are at present quite a few State and Federal Agencies, Local and National Organizations, Legislators, Native Groups and Affected City Governments involved in some capacity at Tar Creek. Nearly all of these groups or individuals have special interests at the Site and are recommending specific limited actions. None at present have proposed understanding the entire Site, as typical Superfund and standard scientific protocol mandate. This includes LEAD Agency, a highly respected local group, whose reluctance to take a stand lends some legitimacy to what these various groups recommend and undertake. For example, EPA's proposed Operable Unit 4 is a very poor next step at Tar Creek, but LEAD Agency has not come out strongly against doing this work, which will result in 8 more years of "studies" and "recommendations" for determining what to do with the chat at the Site.

Future remediation at Tar Creek should be based on its history, experience at the Site and standard scientific (and Superfund) protocol developed by EPA and other Agencies at dozens of similar sites that have been totally remedied.

It must be understood that a myriad of activities caused the complex problems at this Site and that any reasonable solutions must consider the entire spectrum of problems. Even the impacts of each type of remediation alternative on other aspects of site issues must be considered, such as the effects on subsidence by removal of water from the mine caverns. Often, partial, single purpose actions such as OU2 only result in spending large sums of money with temporary solutions that will make future work at Tar Creek even more expensive.

I strongly urge LEAD Agency to encourage those Agencies interested in resolving the problems at Tar Creek to take a holistic approach toward all future work at the Site. The Governors Task Force Report laid out the major issues at Tar Creek very well. The resulting major remediation recommendation of that Report was somewhat shortsighted in calling for a huge Constructed Wetland to cover the site and solve all the problems. However, the separate Task Groups did recommend many reasonable solutions to the major issues. LEAD Agency could consolidate the recommendations in this Report into a holistic approach. Then LEAD could demand that all future work by the agencies include consideration of these holistic recommendations for the Site, not just single aspects such as the piles of mine waste, called at the Site, chat.

The Tulsa Corps District has proposed the most inclusive approach toward future work at the Site that has been issued thus far. LEAD should strongly support this proposed work, and ensure it is inclusive of all the known issues facing Tar Creek. They should then help get funding for this Agency for an enlarged version of their proposed project from Congress.

The Tulsa District Corps work products would then result in an integrated statement of Tar Creek's problems, a schedule for the resolution of these problems and a cost estimate for their resolution. Innovative approaches could then be recommended for consideration. These could include treating Boone Aquifer water and selling it to Oklahoma City, which is seeking additional supplies of water to support growth of its suburbs or use as a local water source.

It is my belief, from experience at several similar Sites, some just as large, that reasonable, complete remediation of Tar Creek can be accomplished for about 300 million and should take no more than 10 years from start to finish.

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