

## **SECTION 8.0 RECOMMENDED REMOVAL ACTION ALTERNATIVE**

Based upon the comparative analyses of alternatives presented in the previous section, Alternative 1 is the recommended removal action alternative. The comparisons to ARAR and risk-based cleanup goals indicate the soils and retort tailings at the Site do not represent an unacceptable health risk to the occasional recreational user of the area. Therefore, based on the RAOs and the risk assessment, no additional action is required to protect human health and the environment. Alternative 1 would also retain the retort building and the historic significance that it represents. Additionally, Alternative 1 has the least impact on the local ecology from road building, materials hauling or consolidation, or other construction activities. Therefore, Alternative 1 is recommended based upon the criteria of effectiveness, implementability, and cost.

Due to its condition, the retort building would represent a physical safety hazard risk to visitors that may enter the building. However, as noted above, neither CERCLA nor the NCP authorize removal actions for the sole purpose of mitigating physical safety hazards in the absence of a release or threatened release of hazardous substances that presents an unacceptable risk. Therefore, removal of the building should not be required under the removal action framework of CERCLA. However, Alternative 2 would have the effect of minimizing the number of visitors to the Site and thus would minimize the physical safety hazard risks associated with the building while retaining the structure and its historical significance. Alternative 3 would also have the same effect. However, some impacted soils would be removed. Alternatives 4 and 5 would be more aggressive measures, which result in the retort building being removed.

The EE/CA has indicated that removal of the retort tailings and downstream sediments is unnecessary from a risk perspective. The retort tailings are in the process of natural reclamation and will reach a state of natural equilibrium with time. The Site is remote and active reclamation activities will require road improvements and moving of materials, thus disturbing of the local ecology that has become established since mining activities ceased at the Site more than 30 years ago. Based on this, natural reclamation will meet the relevant and appropriate components of existing mined-land reclamation guidance and rules.