



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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Seattle, WA 98101-3188

SUPERFUND &  
EMERGENCY  
MANAGEMENT DIVISION

July 31, 2025

Rob Orr, Environment  
Teck American, Incorporated  
501 North Riverpoint Boulevard, Suite 300  
Spokane, WA 99202

Re: EPA Comments on TAI's April 25, 2025, Revised Draft Final Remedial Investigation Report for OU 3, Upper Columbia River Superfund Site

Dear Mr. Orr:

EPA has completed review of the Revised Draft Final Remedial Investigation Report (RI Report) for Operable Unit (OU) 3 of the Upper Columbia River (UCR) Superfund site prepared by Teck American Incorporated (TAI). This was the third version of the RI Report for the Upland OU. While TAI's third version is an improvement from the second version, EPA's comments on previously submitted versions of the Upland RI<sup>1</sup>, were not fully addressed. Given that unacceptable human health risks have been established, EPA will set aside the unaddressed RI Report issues for now so that we can move toward a final Feasibility Study (FS) that will support remedial action in OU 3. Therefore, this letter constitutes conditional approval and direction to TAI to finalize the Upland RI without significant revision to the revised draft final version.

Approval is conditioned on TAI addressing EPA's issues with the Upland RI in the draft and subsequent versions of the Upland FS. The most prominent issues impacting the FS completion are described in Part 1 of Attachment A to this letter. Additionally, the FS and other future UCR RI/FS documents must account for EPA's comments on the presentation and interpretation of RI findings that are listed in Part 2 of Attachment A. EPA's replies to TAI's responses to comments (RTCs) on the draft final version of the Upland RI (Attachment B) should also be considered when presenting Aquatic RI findings.

I can be reached at 206-553-4072 if you have questions.

Sincerely,

*Bonnie Arthur*

Bonnie Arthur  
Remedial Project Manager  
Superfund & Emergency Management Division

Cc:

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<sup>1</sup> The 2006 Settlement Agreement allows for submittal and review of only two versions of each major RI/FS-related document. However, EPA disapproved the draft and draft final versions of the Upland RI so a third version, developed in collaboration with EPA, was permitted to keep the project moving forward.

Yvette Joseph, Confederated Tribes of the Colville Reservation  
Brenden Smith, Spokane Tribe of Indians  
Brendan Dowling, Ecology  
Jeff Johnson, DOI

Attachments:

- A Issues and Comments on Revised Draft Final Upland RI Report
- B EPA Replies to TAI Responses to EPA Comments on Draft Final Upland RI Report