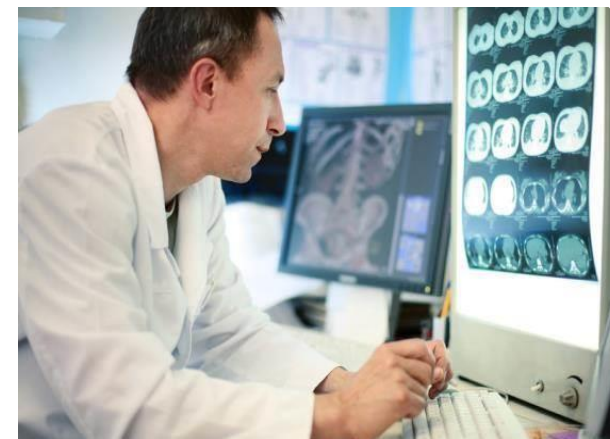
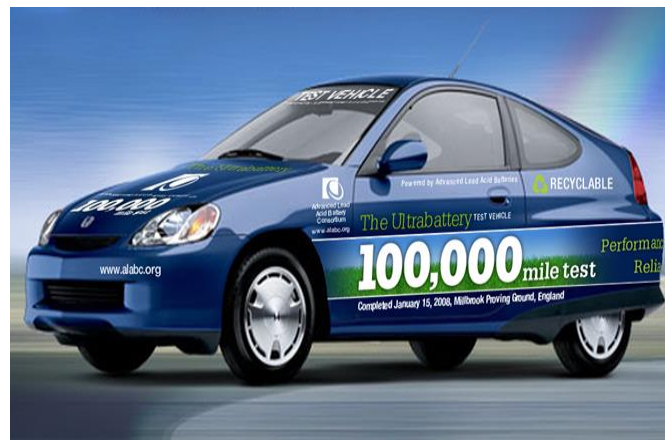


What's New in Superfund

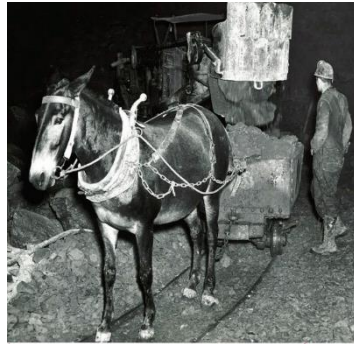
Chris Neaville, Asset Development Director

*Midwest Environmental Compliance Conference:
Wednesday, April 11, 2018*



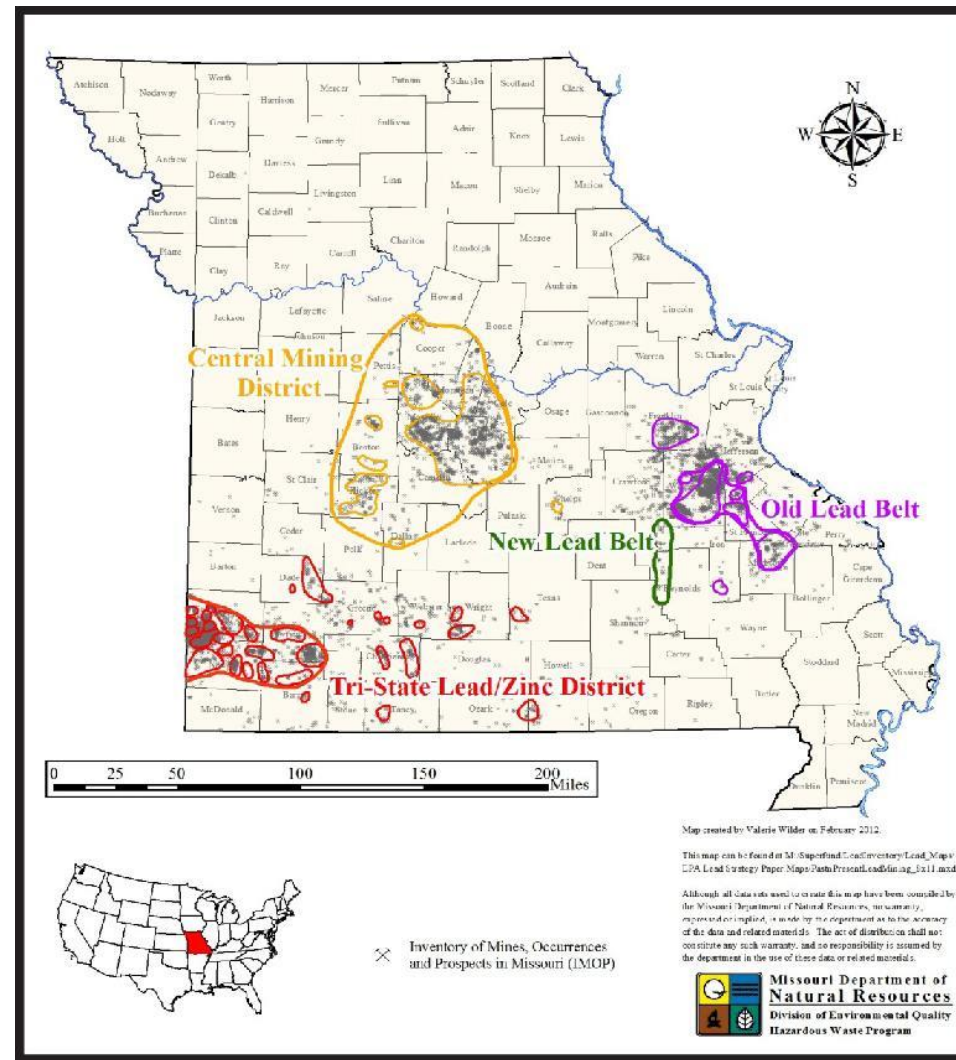
The Doe Run Company: Who We Are

- Mining & metals company
 - (lead, zinc, & copper)
- 5 million tons of ore / year
- Recycle ~13.5 million lead batteries/year
- 1,184 Missouri employees
- Statewide economic impact
 - > \$1 billion/year
- 153 year history



Superfund Task Force Reform 2017

- 1,336 NPL Superfund sites
- Cleanups are taking too long
- Cost is the problem?
 - >\$13 billion (assuming \$10 million per site average)
 - "Mega Site" examples locally:
 - West Lake Landfill (\$236,000,000)
 - Tri-State Mining District:
 - Southwest Missouri, Kansas, & Oklahoma
 - >70 square miles
 - Old Lead Belt:
 - 300 year mining history
 - 4 counties
 - Big River Mine Tailings Site
 - >50 square miles



EPA Superfund Task Force Recommendations

- Part 1: Non-technical Aspects:
 - Efficiency Improvements
 - More private investment
 - Reduce government spending
 - Industry partnerships
 - Brownfield redevelopment & incentives
 - Responsible Parties

EPA Superfund Task Force Recommendations

- Part 2: Technical Aspects:
 - New technology
 - Increase technical resources
 - Risk-Based Decision-making
 - Conceptual Site Model (e.g. risk assessment)
 - Adaptive Management at Complex Sites
 - Interim & Early Actions
 - » Preliminary Remedial Goals (PRGs) based on risk-assessment
 - Clarify Groundwater Cleanup Goals
 - » ARAR waivers
 - » Technical Impracticability determinations
 - » Beneficial Use designations
 - » Alternate Concentration Limits
 - » Historically slow & difficult approvals

Conclusions

- Overly conservative cleanup decisions have historically resulted in a large-backlog of NPL sites that have not been remediated due to the enormous costs required to attempt cleanup targets at very low risk levels which are often not technically achievable in <30 years.
- Proper use of risk assessment represents the greatest opportunity to remediate NPL sites cost-effectively while being protective.
- Greater technical resources are required to implement risk-based remediation.

Stewardship. Integrity. Commitment.

THE
DOE RUN
COMPANY

Questions?

