P. 1

22-141 50 SHEETS 22-142 100 SHEETS 22-144 200 SHEETS

Redacted - Privacy Act

To: Dennie

From: Eric

(314)877 - 3254 (fax)

Re: Comments from MaDOH

Attached is a comment letter from MDOH. I asked them if could send it to you pothat you might be able to cliques then points directly. They said "that would be great!"

The contact is Mr Gale Carbon @ Redacted - Privacy Act

Please will you consider calling him?

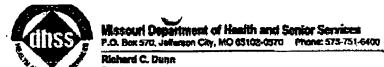
I'm hoping to cloudy as many of cun comments and concerns as possible before the 30th.

Take care,

English States

(cell)

877-3250 (office)







May 19, 2003

Larry Erickson, P.E.
DOE Unit Chief
Federal Facilities Section
Department of Natural Resources
P.O. Box 176
Jefferson Ciry, MO 65102

Re: Request for Review of the North St. Louis County Feasibility Study and Proposed Plan (FS/PP) - Formerly Utilized Sites Remedial Action Program (FUSRAP)

Dear Mr. Erickson:

Thank you for the opportunity to review the North St. Louis County Feasibility Study and Proposed Plan (PS/PP) – Formerly Utilized Sites Remedial Action Program (FUSRAP). As you requested, we concentrated our review on the risk assessment portion (Appendix D of the FS). Based on that review, we have one major concern that needs to be addressed before we can concur that the risk assessment was drafted properly.

Our concern centers around the default exposure assumption that was used for the weight of a child resident. In Table D-2, the body weight of the residential child (1-6 years of age) is listed as 50 kg, and in that same Table, the recreational trespasser (a 6-14 year old child) is also listed as 50 kg. On pages D-12 and 13, these assumptions are further explained. According to generally agreed upon risk assessment protocol, children aged 1-6 years old are assigned an average weight of 15 kg, not 50 kg. This difference caused a three fold lower risk to be calculated for the residential incidental ingestion of surface soil and sediment exposure scenario. Another way to state that is: If 15 kg had been used rather than 50 kg, the calculations would have indicated that the risk was three times greater, and therefore, soil and sediment might need to be remediated to lower levels than proposed.

A separate issue concerns the paragraph discussing risk from exposure to sediments on page D-28. Specifically, an assumption is made that arsenic and five organic chemicals are most likely not due to site activities because of locations of elevated arsenic concentrations found downstream of SLAPS and HISS, but not adjacent to them. We believe that since sediments move downstream over time, this assumption is not valid. These contaminants could have come from the SLAPS and HISS site and been re-deposited from reach A to reach B and C over time.

www.dhistatilesmo.us

The Missouri Department of Health and Senior Services protects and promotes quality at life and health for all Missourisms by developing and implementing programs and systems that provides information and education, effective regulation and oversight, quality services, and surveillance of diseases and conditions.

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Larry Enckson

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May 19, 2003

We intend to continue reviewing this document and will update you should we find further issues of concern.

If you have any questions or comments, please contact Mr. Gale Carlson or me at (573) 751-6160.

Sincerely,

Scott A. Clardy, Administrator

Section for Environmental Public Health

to Clarky or

SAC:GMC:tsw.

FUSRAP Document Management System

Year ID 3646		Further Info?
Operating Unit Site North County	Area	MARKS Number FN:1110-1-8100g
Primary Document Type Public Affairs/Community Re	Secondary Document Typelation Correspondence	<u>e</u>
Subject or Title MoDOH comments on North	County FS/PP e-mailed to Dennis Cham	bers from Larry Erickson
Author/Originator Larry Erickson	Company MDNR	Date 5/19/2003
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