

Redacted - Privacy Act

To : Dennis

From : Eric

(314) 877 - 3254 (fax)

Re: Comments from MCDOH

Attached is a comment letter from MCDOH. I asked them if could send it to you so that you might be able to discuss their points directly. They said "that would be great."

The contact is Mr Gale Carlson @

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Please will you consider calling him?
~~Thank you for your help~~

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

Take care,

Eric

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(cell)

877-3250 (office)

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





Missouri Department of Health and Senior Services
P.O. Box 570, Jefferson City, MO 65102-0570 Phone: 573-751-6400 FAX: 573-751-6010

Richard C. Dunn
Director



Bob Holden
Governor

May 19, 2003

Larry Erickson, P.E.
DOE Unit Chief
Federal Facilities Section
Department of Natural Resources
P.O. Box 176
Jefferson City, 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 (FS/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.dhss.state.mo.us

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Larry Erickson

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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

SAC:GMC:tsw.

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Further Info?

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MoDOH comments on North County FS/PP e-mailed to Dennis Chambers from Larry Erickson

Author/Originator

Larry Erickson

Company

MDNR

Date

5/19/2003

Recipient(s)

Dennis Chambers

Company (-ies)

FUSRAP

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- ☒ North County
- ☐ Madison
- ☐ Downtown
- ☐ Iowa

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