



Missouri Department of Health and Senior Services  
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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.

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

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TOTAL P.02

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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.

Statement by County Executive Buzz Westfall

Public Review and Comment Period for the  
"North County Site Feasibility Study and Proposed Plan"

A portion of the waste stored at the St. Louis FUSRAP site has been cleaned up and that is a positive outcome for the citizens of St. Louis and St. Louis County. The dedication of the Corps of Engineers personnel and the St. Louis Site Remediation Task Force has made this clean-up possible. You are to be commended.

It is, of course, the desire of regional leaders like myself, and many concerned citizens, to continue the clean up at the 515/50 standards. There is, however, the reality of budget cuts that are affecting so many public agencies. I would support, therefore, the USACE Alternative Plan 5 "Excavation with Institutional Controls under Roads, Bridges, Railroads, and Other Permanent Structures" that has been proposed.

Notwithstanding this check on our ability to return to full and complete unrestricted use, I reiterate my commitment of vigilance regarding this important issue. Working together we have made great strides in achieving *The New Spirit of Cooperation* that I pledged to bring to this region in my 1992 State of the County Address, and we will continue along that path of excellence.