NORTH COUNTY

Record of Decision Nears Completion
The North St. Louis County Sites Record of Decision (ROD) identifies the final selected remedy for the North St. Louis County sites. The ROD is the key legal document needed to authorize the final cleanup for these sites.

The North St. Louis County sites consist of the St. Louis Airport Site (SLAPS), the Latty Avenue Properties and the St. Louis Airport Site Vicinity Properties including Coldwater Creek. The sites include commercial/industrial, residential and recreational properties.

On June 22 and 23, 2004, the St. Louis District, U.S. Army Corps of Engineers (USACE) met with personnel from the United States Environmental Protection Agency (USEPA) and the Missouri Department of Natural Resources (MDNR) to resolve comments on the draft ROD. Discussions focused on long-term stewardship concerns, the remedy for inaccessible soils, Applicable or Relevant and Appropriate and Requirements (ARARs) and the approach to address contaminated soil on structures. In general, the meeting went well and was very productive.

The draft ROD was revised based on these discussions. The document was then re-issued for further agency review as a draft final document on September 10, 2004.

What’s Next?
The North St. Louis County ROD will be finalized once issues on the draft final version of the document are resolved. The USACE, USEPA, and MDNR are committed to making every effort to resolve remaining issues with the ROD in a timely manner. USACE expects to submit the document for final approval by the end of December 2004.

ST. LOUIS AIRPORT SITE

Strong Progress in 2004
Crews continue to make strong progress at the St. Louis Airport Site (SLAPS). USACE successfully cleaned up another 5.5 acres of the site in 2004. These cleanup efforts resulted in the removal and out-of-state disposal of more than 106,000 cubic yards of contaminated soil from the site.

To achieve this success, USACE focused its efforts on the western 1/3 of the site, which consists of five separate work areas identified as Phases 2 - 6.

Although significant progress has been accomplished in these areas, more work remains. Storm water control basins will remain in Phases 2 and 3, near the west central portion of the site until no longer needed. Removal work in Phases 4 and 5, at the west end of the site will be completed early this winter. Work on Phase 6 along the southern edge of the SLAPS will continue through 2005.
Coldwater Creek Removal Action is Complete
Crews safely removed radiologically contaminated soils from Coldwater Creek without incident this summer. This small segment of the creek, between Banshee Road and McDonnell Boulevard, was addressed as part of the Phases 4 & 5 cleanup at the west end of the SLAPS.

Removal activities in Coldwater Creek on the western border of SLAPS began on August 6, 2004 and were completed on September 9, 2004.

Removal activities were delayed earlier this year by the presence of high voltage power lines at the west end of the site. The USACE worked closely with AmerenUE to relocate the lines, which service a number of large manufacturing businesses in the area. Once the relocation was complete, crews were ready to begin removing contaminated soil from the creek.

Excavation activities began on August 6, 2004. Two crews, each working daily 10-hour shifts, completed the cleanup. The first shift removed contaminated material from the creek and confirmed that cleanup criteria were met. Without missing a beat, the second shift backfilled and placed riprap over the same creek section excavated by the first shift.

Despite the occasional rains that caused some delays, removal and backfilling activities were completed on September 9, 2004. Approximately 12,700 cubic yards of material were removed from Coldwater Creek as part of the removal action for SLAPS Phases 4 and 5.

What’s Next?
Removal activities in the SLAPS Phases 4 and 5 will be completed this winter. Efforts to complete the cleanup of SLAPS will continue with Phase 6.

ST. LOUIS DOWNTOWN SITE

Plant 6WH Phase I Nearly Complete
The Plant 6 West Half (6WH) - Phase I area is a 20,400 square foot area on the south side of Building 101, between the building’s south wall and Destrehan Street. The area includes a nine-bay loading dock that serves as one of the main shipping and receiving areas for Mallinckrodt Inc.’s St. Louis operations.

To maintain access to this important building during remediation of the Phase I area, it was necessary to divide the planned remediation and restoration into three work areas. Each work area was estimated to take approximately two months to excavate, confirm the area meets cleanup goals, backfill and restore. An estimated total of 2,340 cubic yards of contaminated material was to be removed from the three Phase I work areas based on Pre-Design Investigation sampling results.

Excavation activities in Plant 6WH Phase I were initiated on June 21, 2004. The presence of ground water and numerous utilities (both overhead and underground) presented some challenges to the cleanup. As work progressed, the cleanup was complicated somewhat by contamination found around the buried remnants of former building foundations. Discovery of this “capped” contamination required the removal of the old foundations and the underlying contamination. As a result, the volume of contaminated soil removed from the three Phase I work areas exceeded the estimated total.

Repair of a sewer line in Plant 6WH Phase I.
At the St. Louis Downtown Site (SLDS) crews had to deal with old concrete foundations, overhead and underground utilities and water infiltration during remediation of Plant 6W Half Phase I.

removed from areas 1 and 2 exceeded the estimated volume by approximately 800 cubic yards.

Overall, however, the work progressed better than anticipated. As of October 15, 2004, all areas had been excavated and verified clean. Areas 1 and 2 have been backfilled and fully restored. Area 3 has been partially backfilled. A total of approximately 3,600 cubic yards of contaminated material were removed from Plant 6W Half - Phase I and shipped to a permitted out-of-state disposal facility.

**What’s Next?**
Crews will complete Area 3 of Plant 6W Half Phase I by restoring the manhole and sewer lines, completing backfill restoration and re-paving. Once Area 3 of Plant 6W Half Phase I is completed, crews will prepare to begin remedial activities in Plant 7N/7S, the next Mallinckrodt plant scheduled for cleanup.

**Thomas & Proetz VP Cleanup Progress**
Pre-Design Investigation and remediation design work has been completed for Thomas and Proetz Lumber Company (DT-10). Remediation of the Thomas and Proetz Lumber Company property will be initiated in November 2004.

Excavation activities will be phased to minimize disruption to the property owner’s ongoing daily business operations. Rather than opening all four contaminated areas of the property at once, crews will excavate and restore one area at a time. An estimated 300 cubic yards of contaminated soils will be excavated and removed from the property over a six-week period.
Cleanup Guidelines for Structures

The final “Derivation of Site-Specific DCGLs for North County Structures” or DCGLs document has been finalized. In October 2004, the USACE released the document for public review and comment. Based on public input, the DCGLs document was revised and finalized.

In May 2003, the U.S. Army Corps of Engineers, St. Louis District released a feasibility study for removing radioactive contamination from the North St. Louis County Sites. This study identified alternatives to address site contamination resulting from activities associated with the nation’s early atomic energy program. Although the “Feasibility Study for the St. Louis North County Site” presented some information related to the removal of contaminated soils from the surface of structures, the St. Louis District, U.S. Army Corps of Engineers developed guidelines, which are known technically as “derived concentration guideline levels” (DCGLs), to identify cleanup levels specifically for structures. These measures were documented in the “Derivation of Site-Specific DCGLs for North County Structures”, which was made available for public review and comment July through August, 2004. An electronic copy of the final document, incorporating responses to comments received, is available online at http://www.mvs.usace.army.mil/engr/fusrap/home2.htm.