North County

Long-Term Stewardship (LTS) Meeting

While much remains to be done at the St. Louis FUSRAP sites, citizens can look forward to a day when cleanup work is completed and the land is released for unrestricted use, with the exception of inaccessible areas.

The selected remedy for the North St. Louis County FUSRAP sites calls for removing contaminated soils to meet unlimited use and unrestricted exposure standards with a limited number of specific exceptions. These exceptions include areas where the soils are not easily accessed and do not present an immediate health risk under their current land use. More specifically, contaminated soils may remain if they are located under permanent structures such as roads, active rail lines, and buildings.

U.S. Army Corps of Engineers (USACE) is developing a Long Term Stewardship (LTS) plan to ensure land use does not change and site conditions remain protective over the long term using Institutional Controls (ICs) such as zoning restrictions and deed notices. The USACE is responsible for implementing this plan for two years after site completion. At that time, these responsibilities will transfer to the Department of Energy (DOE) under an agreement between the USACE and DOE.

A Long-Term Stewardship plan will ensure the long-term protectiveness of the remedy for soils located under permanent structures such as roads.

The St. Louis FUSRAP Oversight Committee met with representatives from the DOE’s Office of Legacy Management at a special meeting on May 11th.

The Committee discussed several long-term stewardship issues including:

- DOE’s role in long term stewardship
- Site transition from USACE to DOE management
- DOE process for funding long-term stewardship activities
- Public involvement opportunities in the long-term stewardship process

Oversight Committee Co-Chairman, Ric Cavanagh, stated, “This meeting was a unique opportunity for us to learn firsthand about DOE’s operations in long-term stewardship. It also gave us a chance to voice concerns...
about how DOE will perform these tasks in St. Louis once the clean up of radioactive waste at the sites is completed.”

Meeting attendees included representatives of the USACE, Missouri Department of Natural Resources (MDNR), St. Louis County Government, and the Cities of Berkeley and Hazelwood.

The details of the LTS plan will be closely coordinated with other federal, state, and local government agencies as well as land owners. USACE is scheduled to submit a draft IC design and implementation plan to the U.S. Environmental Protection Agency (EPA) and MDNR for review in January 2007 under the Record of Decision for the St. Louis North County Sites.

Much hard work has been accomplished. As the FUSRAP mission approaches the finish line, USACE remains committed to a careful balance between contamination removal and minimizing project impacts on peoples’ lives (and livelihoods). In all matters pertaining to this balance, the final decision has always been in favor of public safety and security. We fully expect that this will continue to be the choice throughout cleanup and long-term stewardship of these sites.

St. Louis Airport Site

Signal Replacement Supported

As excavation of large open areas of the St. Louis Airport Site (SLAPS) continues, USACE is also working to address small, difficult-to-access areas of contaminated soil. One such area is located at the corner of McDonnell Boulevard and Norfolk Southern Rail Line near the eastern tip of SLAPS.

Norfolk Southern informed USACE that it planned to replace the current railroad crossing signal. The railroad’s plan to replace this signal made soils in an otherwise inaccessible area of SLAPS accessible for cleanup. While most of the contaminated soil in this area had already been removed, contamination remained beneath the existing signal. USACE left this soil behind to minimize potential traffic and safety problems on heavily-traveled McDonnell Boulevard.

In order to address the signal area and support the railroad, USACE closely coordinated field activities with local agencies and utilities. St. Louis County Highway and Traffic Division supported excavation activities immediately adjacent to McDonnell Boulevard. Missouri American Water Company supported the location of an existing water line. In addition, crews worked closely with Norfolk Southern to ensure the existing crossing signal was not damaged and to locate communication lines critical to operation of the crossing signal when a train was in the area.

Approximately 390 cubic yards of contaminated soils were removed. Cleanup activities included saw-cutting and removing 80 linear feet of McDonnell Boulevard’s shoulder, placing traffic barriers along the affected area of McDonnell Boulevard, removing contaminated soils, and backfilling with clean soil. With cleanup and backfill complete, Norfolk Southern has scheduled the new signal for installation in June 2006.

Cleanup Approaches Completion

Cleanup of contaminated areas at SLAPS continues at a steady pace. However, funding constraints have forced USACE to make difficult choices. USACE had to choose between shutting down the site mid-season
or continuing excavation activities and limiting the shipment of contaminated soil to out-of-state facilities.

Continuing business as usual (excavating and shipping contaminated soils to out-of-state facilities for disposal) would mean shutting down the site in the middle of the construction season this summer. Under this scenario, the contractor would “demobilize” from the site. Highly trained and experienced field crews would be laid off until USACE received funding for the next government fiscal year in October. Construction equipment would either be cleaned and sent off-site or remain idle. Although no equipment would be working, USACE would take measures to prevent contaminated sediments from moving off-site.

Conversely, continuing excavation activities and limiting off-site shipments would allow the USACE to keep the contractor working onsite. Field crews could work straight through to project completion. The shipment of excavated soils would be temporarily delayed until the next government fiscal year when funding is received. These soils would instead be temporarily stockpiled onsite.

Not willing to lose the expertise of its contractor or incur additional expenses to re-mobilize equipment the following fiscal year, the USACE chose to focus on completing excavation of contaminated areas and position the site for completion in 2007.

The contractor will stockpile the soil beside the railcar loading area. At its maximum volume, the stockpile will be approximately 12 feet tall and will cover approximately 1 acre. Storm water run-off from the contaminated stockpile will be collected, treated, and tested before release.

To control potential public and environmental exposure to fugitive dust and to minimize erosion of the stockpile, a soil stabilizer will be applied to the surface of stockpiled soil. The soil stabilizer is a polymer-based solution that becomes completely transparent after drying. The stabilizer creates a temporary surface “crust” that is impermeable by water. It will have no adverse impact on the environment.

This approach allows for the maximum amount of contaminated soil to be removed, given current funding levels. Groundwater, surface water, and atmospheric contact with contaminated soil is minimized, soil is positioned for immediate shipment as funds become available, and the expense associated with the demobilization and/or idling of construction equipment is eliminated. All things considered, stockpiling at SLAPS is beneficial to USACE, the contractor, and the taxpayer.

To position the site for completion in 2007, SLAPS contaminated soils will be stockpiled onsite beside the railcar loading area.
Institutional Controls (IC)

A Critical Component of Long-Term Stewardship (LTS)

**Question:** When all is said and done and the excavation equipment is gone, is that the end of FUSRAP in North County?

**Answer:** In short, no. Contaminated soils under permanent structures at the North County FUSRAP sites such as active roads, rail lines, and the Futura Coatings buildings have been deemed inaccessible. Due to the high cost associated with replacing these structures and potential worker safety issues, these soils will be left undisturbed. A Long-Term Stewardship (LTS) plan will be developed to ensure the long-term protectiveness of the remedy.

Critical to all LTS plans are Institutional Controls (ICs). ICs are administrative and legal controls that are used when residual contamination remains onsite at a level that does not allow for unrestricted land use. Some common examples of ICs are:

- easements
- zoning restrictions
- well-drilling prohibitions
- deed restrictions
- state or local ordinances

Implementing ICs should prevent inaccessible contaminated areas from being developed and used for residential housing, elementary and secondary schools, child care facilities, and playgrounds. While ICs may sound imposing, they only affect areas that are already inaccessible to the general public. USACE is cleaning areas accessible to the general public to a degree that will allow unrestricted use.