Mel Carnahan, Governor • Stephen M. Mahfood, Director

STATE OF MISSOURI DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY P.O. Box 176 Jefferson City, MO 65102-0176

December 8, 1998

Ms. Sharon Cotner, Project Manager Formerly Utilized Sites Remedial Action Project Department of the Army St. Louis District, Corps of Engineers 9170 Latty Avenue Berkeley, MO 63134

RE: Transmission of Sampling Results to Missouri Department of Natural Resources

Dear Ms. Cotner:

The Missouri Department of Natural Resources (MDNR), Federal Facilities Section (FFS), is formally making a request to receive all final sampling data before any excavation is backfilled by the U.S. Army Corp of Engineers (USACE). The success of this project is dependent on good communication between the agencies. To date the flow of information has been one way; e.g., supplied results from split background sampling results.

FFS understands that a short time frame for review is necessary to get the excavation backfilled as quickly as possible. Until on-site personnel is available, the USACE may have to put forth some additional effort to assure the data is made available, either sent to the Jefferson City office or by providing the opportunity to review the data at the USACE trailer. MDNR also understands that the information review is a working copy and will handle the data in an appropriate manner. MDNR believes that any data used for making decisions, i.e., whether or not to backfill, should be available for review by regulatory agencies.

FFS is responsible for conducting independent oversight of this project that includes but is not limited to the review of final sampling data, and independent or split sampling. To determine that the USACE contractors have met the requirements of the Record of Decision or the Engineering Evaluation/Cost Analysis with respect to the clean up levels it is necessary to review the data and concur that the cleanup levels have been meet.

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The idea of going back to excavate a hole that was just backfilled because MDNR or EPA has a problem with the data would be an inconvenience and a waste of money to the USACE. That situation is unacceptable to MDNR. Therefore, FFS requests to review the data before the excavation is backfilled. Several options have been attached to this letter, which are acceptable to MDNR for handling the review of data.

If you have any questions, or need further information, you may contact Mr. Scott Honig of my staff at (573) 751-3087.

Sincerely,

HAZARDOUS WASTE PROGRAM

Larry V. Erickson, DOE Unit Chief

Federal Facilities Section

LE:shg

Enclosure

c: Dan Wall, EPA

FUSRAP Data Review Options

Option A

- 1) MDNR receives screening sampling results used to decide whether to conduct confirmatory sampling.
- 2) MDNR reviews screening sample results.
- 3) Conduct split sampling during confirmatory sampling.
- 4) MDNR provide split sample results to USACE.
- 5) Decision is made whether or not to backfill.

Option B

- 1) Confirmatory sampling is done by USACE.
- 2) USACE has SAIC fax sampling results and MARSSIM information to MDNR at the same time as the information goes to Dennis Chambers, USACE.
- 3) Approval is given to backfill the excavation by the USACE to the contractor.
- 4) MDNR decides to take samples before backfilling is done.
- 5) If MDNR doesn't get out into the field in time to collect samples before backfilling is completed then the samples will not be collected. MDNR doesn't expect USACE to hold open the excavation for MDNR sampling.

Cataloging Form
{Technical/Project Managers fill in C through G, K through Q. RM completes other fields}

A. Document ID Number: Assigned by database 00-407 B. Further Information Required?:
C. Operable Unit (Choose One): USACE St. Louis Sites Downtown St. APS North County Madison Sites Inaccessible Areas PRP Oversight Committee D. Site (Optional): SLDS VPs Mallinckrodt SLAPS Mallinckrodt SLAPS Mallinckrodt CWC HISS Malison Oversight Committee
E. Area (Optional):
F. Primary Document Type (Choose One): Site Management Records Remedial Action Public Affairs/Community Relations Congressional Relations Feasibility Study Remedial Design Project Management Corresponde
G. Secondary Document Type (see back of form): San Pling / Analysis Datas Plans
H. Bechtel Number: I. SAIC Number:
J. MARKS Number (Choose One): FN: 1110-1-8100e FN: 1110-1-8100f FN: 1110-1-8100g FN: 1110-1
N. Recipient(s): Share R. Cetron O. Recipient(s) Company: PM-R
P. Version (Choose One): Draft Final Q. Date: Dec \$ 1998
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