

MAR 12 1999



Mel Carnahan, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

March 10, 1999

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

RE: Draft Final Sampling and Analysis Program Plan for the St. Louis Sites

Dear Ms. Cotner:

This letter is in response to the Formerly Utilized Sites Remedial Action Project (FUSRAP), St. Louis Sites Draft Final Sampling and Analysis Program Plan (SAPP), submitted to the Missouri Department of Natural Resources on February 5, 1999. A list of comments has been prepared and attached for your review and response. The comments must be resolved prior to issuance of the Final SAPP.

If you have any questions, or need further information, you may contact myself or Mr. Scott Honig, at (573) 751-3907.

Sincerely,

HAZARDOUS WASTE PROGRAM

A handwritten signature in cursive script that reads "Eric Gilstrap".

Eric Gilstrap, P.E.
Environmental Engineer

EG:shg

Attachments

**Final Sampling and Analysis Program Plan (SAPP) for
the St. Louis FUSRAP sites
St. Louis, MO
March 1999**

General Comments:

1. SAPP needs to include a section on how data will be reported to the regulators and public. Similar comments were made during the review of previous SLAPS and SLDS SAPPs. USACE responded to those comments, "Not Applicable to SAPP; comment acknowledged for data reports." Missouri Department of Natural Resources (MDNR) would disagree with the USACE and say that the SAPP would be a perfect place to establish a uniform method for data presentation. The following are a few of those comments made in the previous comment letters:
 - 1a. All data collected as part of this SAPP and previous sampling events should be reported in tabular form listing the laboratory results for each analyte by soil sampling location or monitoring well by sampling date. The table should also reference the detection limit by analyte and analytical method. Groundwater sampling reports/data should also include depth to water, casing elevation, groundwater elevation relative to a fixed datum or sea level, total well depth, and screened interval.
 - 1b. The department would also request that groundwater reports include site maps for each analyte with iso-concentration contours and a potentiometric surface map for each hydrostratigraphic zone.
 - 1c. Copies of all validated analytical results with completed chain of custody documentation should be included in the appendices or as a separate document.

Specific Comments:

1. Page 22, Section 1.6.1, Data to Support Characterization Studies. Please identify the areas where additional characterization to meet the requirements of this section is necessary besides Coldwater Creek. MDNR believes additional characterization of Coldwater Creek is necessary.
2. Page 22, Section 1.6.2. The SAPP should include a list of areas which a feasibility study will be required i.e., Coldwater Creek, inaccessible soil.
3. Page 23, 1.6.3. "Data collected to support he remedial..." should be "Data collected to support the remedial..."

4. Page 24, 1.6.6. Please provide a list of possible non-impacted areas to be used along with justification for review by MDNR before final selection is made by USACE.
5. Page 24, 1.6.7. "The Record of Decision (ROD) will define cleanup plevels for..." should be "The Record of Decision (ROD) will define cleanup levels for..."
6. Page 24, 1.6.7. Will MDNR be provided with individual (survey units or areas) final status survey sampling plan? If yes, what is the timeframe for review of those plans? If no, then please explain why.
7. Page 25, 1.7.1. MDNR would like to review the conceptual model developed for SLAPS, HISS, etc. Is this method (observational approach) to be used with the environmental monitoring program to determine the effects that removal actions are having on the site, and monitor the movement of contaminants?
8. Page 26, 1.7.2. These are a discussion of a technical decision team under the adaptive sampling and analysis section. Who is on the technical decision team? Please provide a list of members. If MDNR is not on it, please include an MDNR representative on the team. The increase in field personnel will make it feasible for MDNR to participate with the USACE.
9. Page 32, 2.2.5. What is the schedule for Meteorological Monitoring equipment installation? The USACE has already done one round of sampling at SLAPS under the final SAPP for SLAPS (USACE/OR/DACA62-1045, June 1998) which required a meteorological unit to be installed. MDNR has not seen the unit installed to date at any of the sites. How has meteorological data been collected during the past events? MDNR would expect that information to be included in any sampling report. At a previous meeting discussing the SLAPS SAPP, MDNR suggested that the meteorological unit could be removed to save money and use meteorological data from the airport, but was informed that it was necessary to have an on-site unit.
10. Page 39, 2.2.6. Ambient air monitoring does not include radon.
11. Page 68, 3.6.1.5. What type of sealed calibration source checks is to be used?
12. Table 1-1 has incorrect Investigative Action Levels (IALs) for vicinity properties at SLDS. At depths greater than four or six feet, Ra-226, Ra-228, Th-230, and Th-232 IALs should be 15 pCi/g above background and U-total IAL should be 50 pCi/g above background. See Page 64 and A-27 of the Final Record of Decision for the St. Louis Downtown Site, October 1998.

13. The Draft Final Sampling and Analysis Program Plan for the St. Louis Sites, St. Louis, Missouri, January 1999, does not bear the seal of a geologist who is registered in the State of Missouri. The document incorporates, or is based on, a geologic study, or on geologic data that had a bearing on conclusions, or recommendations reached after January 1, 1997. The Missouri Board of Geologist Registration is charged with the enforcement of the Missouri Geologist Registration Law. The law includes the requirement that geologic work, where public health, safety, or welfare are at risk or potentially at risk, be completed by or under the direct supervision of a geologist registered in Missouri. The following review comments and/or recommendations convey no endorsement as to the validity of the work being completed in accordance with the Missouri Geologist Registration Law or the Board of Geologist Registration. Further, the review comments and/or recommendations cannot be accepted as being fully completed until the reviewed document is properly sealed/stamped by a geologist registered in Missouri in accordance with the law and the rules as administered by the Board.
14. Page 20, 1.5.1. "Four CERCLA interim actions have been performed at SLDS since April 1994, involving the removal of contaminated soil and demolition of structures. These actions have included excavation of soils from the City Property, excavation of soils at Plant 10 area, building demolition and excavation of Plant 6 and 7 area, and building demolition and excavation in Plant 2 area." This statement is incorrect because excavation has not been completed in Plant 2, 6, or 7 areas. Building demolition has been completed and excavation in Plant 2 has started, not under an interim action but under a final action. In the next paragraph a discussion of remaining response actions is provided, but the paragraph does not include the Plant 1 area.
15. Page 23, 1.6.5. Will a new site-wide health and safety plan be developed to go along with this site-wide sampling and analysis program plan? The document should list the requirements or documents, i.e., health and safety plan, which list the requirements for site-wide ambient air quality monitoring. The plan does not discuss the measuring of the radiation dose for worker exposure during the field activities.
16. Page 29, 1.7.3. MDNR does not believe biased sampling should be done to define the boundaries of impacted areas and non-impacted areas. Please provide a clarification of how biased sampling will be used to define impacted and non-impacted areas.

17. Page 37, 2.2.3.1. "Gamma walkover surveys will be used to confirm the boundaries of radiological Contaminants of Concern (COCs) for remedial action (exceeds the IALs) and to verify the removal of contaminated soil." Please provide the assurance that gamma walkover surveys will be strictly for confirming boundaries of radiological COCs for remedial action and will not be used as a means to define such boundaries.

Cataloging Form

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

A. Document ID Number: Assigned by database 969

B. Further Information Required?: ☐

C. Operable Unit (Choose One):

USACE ☐
St. Louis Sites ☒
Downtown ☐
North County ☐
Madison Sites ☐
Inaccessible Areas ☐
PRP ☐
Oversight Committee ☐

D. Site (Optional):

SLDS VPs ☐
Mallinckrodt ☐
SLAPS ☐
SLAPS VPs ☐
CWC ☐
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F. Primary Document Type (Choose One):

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Removal Response ☐
Remedial Investigation ☐
Feasibility Study ☐
Record of Decision ☐
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Public Affairs/Community Relations ☐
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Freedom of Information Act ☐
Real Estate ☐
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G. Secondary Document Type (see back of form): Sampling & Analysis Correspondence

H. Bechtel Number: _____

I. SAIC Number: _____

J. MARKS Number(Choose One): FN: 1110-1-8100e ☐ FN: 1110-1-8100f ☐ FN: 1110-1-8100g ☐

K. Subject/Title: MDNR Comments on the Draft Final Sampling & Analysis Program Plan for the St. Louis Sites

L. Author: Eric Adair

M. Author's Company: MDNR

N. Recipient(s): Sharon Cotner

O. Recipient(s) Company: PM-R

P. Version (Choose One): Draft ☐

Final ☒

Q. Date: 3/10/99

R. Include in the ARF? ☒

S. Include in the AR? ☐

T. Filed as Confidential/Privileged? ☐

U. Document Format (Choose one):

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