

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

Bob Holden, Governor • Stephen M. Mahfood, Director

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

December 3, 2001

Ms. Sharon Cotner  
U.S. Corps of Engineers  
St. Louis District Office  
9170 Latty Avenue  
Berkeley, MO 63134

RE: Site Management/Control

Dear Ms. Cotner:

The recent activity associated with Vicinity Property (VP) 24 of the North County Formerly Utilized Sites Remedial Action Program (FUSRAP) brings to light several issues and concerns relating to current and future management of sites that may have residual contamination. Removal of contaminated soil by an unknowing property owner could cause additional health and environmental concerns; a situation we all hope to avoid. I'm sure you will agree, reliable information must be tracked and available to ensure the status of sites/property and remaining contamination is readily identifiable to anyone needing this detailed information.

First, it appears that no specific environmental or health problems actually occurred related to recent exposure or release of contaminated material from this property, however, it does indicate a symptom of some of the problems we could continually face regarding the FUSRAP cleanups. Sufficient safeguards and procedures must be developed to minimize the potential for contaminated soils to be inappropriately moved or used and more important to protect the public and or workers from potential exposures.

One aspect of the Federal Facilities Sections' oversight involvement includes keeping other sections within the department aware of the status of cleanup activities and areas where overlapping authorities or concerns may exist. When the property owner's consultant advised our Voluntary Cleanup Section that soil from VP24 may be used, we were immediately brought in for consultation. Likewise, your office was requested to provide available data to determine which areas are known to have been sufficiently cleaned up, contain residual contamination as well as areas that need further investigation. Even on this one property, numerous calls, discussions and document and file reviews were required by all of those involved in order to determine this information. All of this activity has led to your office conducting additional site surveys to further characterize the site in order to determine if contamination exists on the property.

This incident again highlights several weak points and process improvements that may need to be addressed. We are hopeful the stewardship document work, being lead by Mr. Dell'Orco of your staff, will ultimately have all the "what to do, when to do it, and who pays for it" answers,

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when issues like VP24 arise. Understanding the history and remediation status for properties like VP24 or instances that are similar in nature (i.e., utilities, paving/ construction activities, etc.) would be helpful for all of us and also for the development of the stewardship document.

From our perspective much of the necessary information may currently exist, however, is not readily accessible. We would appreciate knowing if you have and will provide the following information in order for us to ensure these concerns are being addressed.

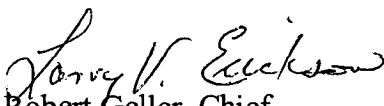
- Identification of all properties where the owner or other interested party was notified the property has been remediated to "clean."
- Identification of all St. Louis FUSRAP properties where the owner, contractor, or utility company relocated soils, aggregates, pavement, or other construction material? Specifically:
  - Address/location of the originating property,
  - Address/location of the receiving or final destination,
  - Approximate dates of removal and types of material and volumes, and
  - Description of U.S. Army Corps of Engineers (USACE) support provided for these activities.

Also, it would be helpful to have a listing with references of the USACE's instruments or processes used or available that could be used to further address the prevention or removal/relocation of contaminated residual soils.

We appreciate the proactive efforts being taken by your office toward the development of a Long-Term Stewardship plan. The most recent meeting presented a "table of contents" framework that should help focus on getting the necessary details to satisfy concerns when dealing with sites impacted by FUSRAP residual material. We would appreciate a written response to the above questions within thirty days. Thank you for your attention to this matter.

Sincerely,

HAZARDOUS WASTE PROGRAM

*for*   
Robert Geller, Chief  
Federal Facilities Section

RG:lep

c: Mr. Dan Wall, U.S. EPA, Region VII

# FUSRAP Document Management System

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North County

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Author/Originator  
Larry Erickson

Company  
MDNR

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