

Mr. Miller,

The concept of a panel of experts was originally proposed to assist the St. Louis Site Remediation Task Force (SLSRTF) in better understanding the current impacts of radionuclides present at the St. Louis Airport Site (SLAPS) and adjacent ballfields on the water and sediment quality of Coldwater Creek. The concept was expanded to include an assessment of the possible effects resulting from migration of radionuclides to deeper groundwater over the next 100 years. The radionuclides exist in the soil and shallow groundwater at the SLAPS.

The Task Force was formed in September of 1994 in response to a proposed plan for site remediation that was deemed unacceptable by the community. (The DOE's original proposal called for the SLAPS to be used as a disposal location for the wastes from the entire St. Louis Site.) The Task Force is comprised of community members, representatives of local governments, academicians, and representatives of local businesses and utility companies. The Task Force is charged by DOE with determining a remedy for the entire St. Louis site. The remedy must be acceptable to the citizens of the community and meet CERCLA requirements and federal budgetary constraints. For over a year the Task Force has been gathering information from a wide range of sources; in essence, educating themselves in order to make the best decision possible regarding the disposition of the site.

The questions presented to the panel regarding impacts of the SLAPS on water and sediment quality are central to the Task Force's decision-making process because the SLAPS represents a large portion of the total cost and volume of material associated with the St. Louis Site, and because the Task Force has placed a high priority on protecting human health and the environment.

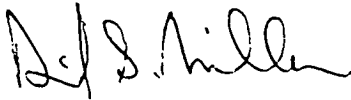
If the panel determines that the SLAPS area hydrologic resources are substantively threatened (by the SLAPS), the immediacy of that threat will be important to the Task Force. Most participants recognize that because of the size of the larger St. Louis site, any remedial action will take many years to complete. Any action taken at the SLAPS will have schedule and budget implications that affect the prioritization of remedial actions for the entire site. Therefore, it is important that the Task Force members be as knowledgeable as possible about the magnitude and timing of likely threats to water and sediment quality.

To be as useful as possible to the Task Force, the panel must be able to assimilate a great deal of geohydrologic information, interpret it, and communicate it in such a way that a group of non-experts can use it to make critical decisions. It is especially important that the panel recognize that the Task Force is an ephemeral coalition of volunteers; this is the only opportunity for meaningful community participation that has arisen in the history of the site, and we have no way of knowing how long this window of opportunity will remain open. A primary reason for choosing a panel of experts rather than an independent study was to expedite the decision-making process.

Several members of the panel have expressed reluctance about recommending additional studies. While a great deal of information has been gathered to date, there may be legitimate data inadequacies that need to be remedied in order to fully address specific concerns. These inadequacies should be brought to light. It will be most useful if the panel can be as specific as possible about the type of additional information required and the issues the data will resolve. Regulatory agencies, concerned citizens, and the Department of Energy can look to those recommendations for resolution of difficult issues.

The most significant contribution will be to identify areas where there is technical agreement between the panel members; laying a scientific foundation for confident decision making and providing common ground for the understanding of the site's impacts on local water and sediment quality among the members of the Task Force. If the panel is able to reach consensus on critical issues, they will have provided the Task Force with an invaluable product.

Sincerely,

A handwritten signature in cursive script, appearing to read "David S. Miller".

David S. Miller

Dear Mr. Miller,

Dave Miller of SAIC has suggested that I jot down perspectives on the context within which your panel of geohydrologic experts was formed. He has done the same, and his thoughts are attached. Rather than merge his perspectives with mine, I've chosen to send his thoughts in his own words, and to simply add some of my own. I hope that these perspectives are helpful.

1) A key issue has always been whether or not the SLAPS site is having, or will have significant impacts on proximate surface and ground water resources. After several years and many \$millions in studies, DOE has taken the general position that no near-term impacts are anticipated. Recognizing that impacts far into the future (centuries) away are more difficult to estimate, DOE has still concluded that current conditions are not expected to result in anyone drinking from contaminated supplies for the predictable future. The public has no strong incentive to accept this assessment, and no independent assessments from neutral (and respected) third parties have surfaced. EPA, at the staff level, has publicly "concurred" with DOE's assessment, but the State analog (MDNR) has been generally unwilling to draw any firm conclusions.

If the ultimate remedy were to be chosen solely upon actual risks posed by the site (an unlikely but plausible scenario!), and DOE's conclusions concerning the geohydrology are sound, logic would lead to some form of in place monitoring/management strategy for the SLAPS site-- at least for the next several decades. This all assumes that the cost of excavating and relocating site soils would be hundreds of millions of dollars. If, conversely, resource protection considerations require relocation of the site soils, the challenge ahead would be to pursue far larger budgets than are currently planned for the FUSRAP program.


2) The timeframe built into the questions put before the panel were very carefully chosen after coordination with other participants in the Task Force effort. We chose one hundred years as the assessment timeframe for deep groundwater impacts not because the following decades aren't important (they are), but because the nearer century is so much more relevant now. If, as some allege, resource impacts are significant, we need to properly reflect those realities in our near-term budgeting efforts.

In selecting a timeframe, we also hoped to ask questions that could be answered with a high degree of certainty. I always assumed that if we selected a much longer timeframe (eg. 1000 years), the panel would come back with highly indefinite answers-- in effect placing us and our public teammates back in the same box we were in before hand. If in fact, the panel can speak to longer timeframes, or believes that additional data would allow the panel to speak to longer timeframes with certainty, please feel free to reflect this in your conclusions. Obviously, before a decision on permanent management of the wastes can be made, timeframes longer than one hundred years would need to be evaluated.

3) I believe that your panel has credibility that can carry the project forward-- the task force seems very content to hand resolution of these key technical questions over to the panel, and prepared to accept your conclusions as valid truths. Both EPA and MDNR appear to be comfortable getting these questions out of their offices and into yours. From my perspective, we are replacing an unending back and forth between regulated, regulators, and activists (which the public was skeptical of), with a very productive process. Long-term control strategies for the SLAPs site will not be based entirely on your panels conclusions, but it isn't possible to even move forward in a reasoned way (even on very near-term initiatives) until some closure is reached on the questions you are focused on.

Please contact me at (423)-576-9634 if you would like to discuss any of this further.

Sincerely,

A handwritten signature in cursive script, appearing to read "David [unclear]".