



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

MAY 3 4 21 PM '96

APR 29 1996

Mr. David Adler
Former Sites Restoration Division
U.S. Department of Energy
Oak Ridge Operations
P.O. Box 2001
Oak Ridge, Tennessee 37831-8723

Dear Mr. Adler:

Re: Engineering Evaluations/Cost Analysis (EE/CA) for the St. Louis Site Ballfields

We have reviewed the above referenced plan and have outlined our comments below.

General Comments:

The Environmental Protection Agency (EPA) supports the stated objectives of this proposal: 1) restore the ballfields for recreational use; 2) provide relief to utility companies needing access to roadside ditches; and 3) reduce stormflow sediment transport to Coldwater Creek.

As you are aware, the EPA has a long-standing position with regard to interim response actions at this site, reiterated as follows: we are in favor of the expedited implementation of all actions that result in the release of properties for unencumbered use or redevelopment. Further, we are in favor of maximizing the number and scope of cleanup actions that can be accomplished over the near-term by taking advantage of available storage capacity at heavily contaminated properties with controlled access such as the SLAPS and HISS, which in all probability will remain dedicated to their current use for many years to come even with a comprehensive remediation plan in place. While we would generally take no issue with proposals to permanently dispose of waste materials, we do not believe that shipping large volumes of materials to Envirocare or other remote disposal site on an incremental or ad hoc basis is a cost-effective use of cleanup dollars. This approach severely constrains the extent of cleanup that can be achieved with available funds. In the event we ultimately decide that this is the preferred option for final disposition of these materials, we will be in a better position to negotiate disposal costs, optimize mobilization and transportation efforts, and take advantage of economy-of-scale factors.

For the above reasons, EPA prefers Alternative 2A (removal of all material from the ballfields to the SLAPS for interim storage) over Alternative 2B (removal of all material from the ballfields to a commercial disposal facility). Alternative 2A is preferred over Alternative 3 (removal of hot spots to a commercial disposal facility), given that it is a less complete cleanup with a more uncertain final disposition for essentially the same cost.

We believe that the managed placement of the contaminated ballfield soils on the SLAPS will have a positive overall impact on public health and the environment and is consistent with overall remediation goals.

We believe that this and other interim response actions can be accomplished without unduly prejudicing final remedial action decisions. This and all proposals should be explicit in their handling of this issue.

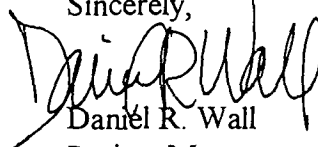
Specific comments:

We suggest that a revision of this document include the following:

- volume estimates and locations of materials exceeding the "hot spot" criteria;
- the hot spot criteria should be tied to a health consideration;
- show post-removal action drainage controls;
- describe methods for placement of materials on SLAPS

Thank you for the opportunity to review this proposal.

Sincerely,


Daniel R. Wall
Project Manager
Superfund Division

cc: Robert Geller, MDNR
Jim Dwyer, SLSRTF

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Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for the St. Louis Site, Missouri



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