



## Department of Energy

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Oak Ridge Operations  
P.O. Box 2001  
Oak Ridge, Tennessee 37831—

January 31, 1996

Mr. Daniel Wall  
Site Assessment and Federal  
Facility Section - Superfund Branch  
U.S. Environmental Protection Agency  
Region VII  
726 Minnesota Avenue  
Kansas City, Kansas 66101

Dear Mr. Wall:

### **QUARTERLY PROGRESS REPORT FOR THE PERIOD OCTOBER - DECEMBER 1995 FOR THE FORMERLY UTILIZED SITES REMEDIAL ACTION PROGRAM (FUSRAP) ST. LOUIS SITE**

The following items represent the significant activities and achievements related to the FUSRAP St. Louis Site for the period October through December 1995:

- There were no Federal Facility Agreement (FFA) milestones scheduled during this period; however, all other FFA required activities were completed as necessary. In addition, the EPA, DOE, and Missouri Department of Natural Resources (MDNR) project managers had frequent discussions to address technical, cost, and schedule issues related to the St. Louis Site.
- Soil excavation work at the St. Louis Downtown Site (SLDS) Plant 10 was completed during the month of October. A total of 149 gondolas containing approximately 11,000 cubic yards of waste materials have been shipped from SLDS for disposal. Shipment and disposal of the remaining 2500 cubic yards staged at the east end of SLDS have been deferred until spring because of delays in the passage of a federal budget.
- The independent verification contractor (IVC) issued its preliminary report on the verification survey of the Plant 10 area. Based on this report, it was determined by the IVC that the area can be released without radiological restrictions.
- During the month of November, the hazardous, residual crushed brick found in the rock crusher during the Plant 10 removal action was successfully treated. This material was found inside the rock crusher when it arrived at SLDS from another FUSRAP site. The residual crushed brick contained barium at concentrations that caused the brick to fail the Resource Conservation and Recovery Act (RCRA) toxicity characteristic based on the Toxicity Characteristic Leachate Procedure (TCLP).

The treatment of this material consisted of mixing the crushed brick and ferrous sulfate for 20 minutes at a 2:1 ratio (by weight). Upon completion of this blending, pre-mixed Portland cement was added in a portion sufficient to ensure a final mixture that was both flowable and curable. The final volume of the resulting material was approximately 8 cubic feet. After curing, a sample of the final material was submitted for TCLP barium analysis. The results indicated that the barium concentration in the TCLP Leachate was .17 ppm. The RCRA criteria is 100 ppm. The nonhazardous waste was shipped out of state to Envirocare for disposal as a Low Level Radioactive Waste during the month of January.

DOE kept MDNR apprised of its plans and arrangements for the treatment and ultimate disposal of the material throughout the process. A final report was issued to MDNR on the treatment of this waste on December 4.

- The independent verification contractor (IVC) issued its report verifying that Latty Avenue vicinity properties 3L and 6L (also known as the Quaker State property and the Rykoff-Sexton property, respectively) were released without radiological restrictions. Actual remediation work on these properties was completed at the end of September, and the final cleanup verification surveys and property restoration took place during October. Approximately 1500 cubic yards of soil were excavated and loaded onto gondola cars for shipment and disposal at Envirocare.
- The onsite radiological measurement laboratory began operations during the month October to support characterization and post-RA survey activities for the St. Louis area sites and vicinity properties. The laboratory is located at the Hazelwood Interim Storage Site (HISS) and will be used to analyze radiological samples. The laboratory was most recently used to support pre-RA sampling on the Frost Avenue vicinity properties and Hazelwood Avenue vicinity property #32. The use of onsite laboratory will provide quick turnaround of analytical results at a reduced cost to DOE.
- The St. Louis Site Remediation Task Force held meetings in October, November, and December. Several Task Force working groups continued to meet to discuss whether select technologies should be applied to remediation of the St. Louis Site and what strategies should be developed to publicize Task Force activities. The significant conclusions drawn by the Task Force to date are listed in Enclosure 1 to this report.

The "blue ribbon" panel of experts in geology/hydrogeology, which was assembled at the request of the Task Force to address potential impacts of SLAPS on Coldwater Creek and the deep groundwater beneath the site, met in St. Louis on September 15, October 5, and December 13. The panel heard presentations from FUSRAP technical staff on contaminant transport, groundwater modeling, site geology and hydrogeology, and risk assessment. The panel's written report is expected in February 1996.

The Task Force also evaluated its membership, deciding to add representatives from several key stakeholder groups that were identified as being potentially impacted by activities at the St. Louis Site. The Task Force approached officials in the cities of Black Jack and Florissant, which are impacted by Coldwater Creek, as well as representatives of the McDonnell Douglas Corporation, the U.S. Army Corps of Engineers, the City of Bridgeton, Southwestern Bell Telephone Company, and the Metropolitan St. Louis Sewer District. The City of Bridgeton, and the Metropolitan St. Louis Sewer District opted to join the Task Force as voting participants; the other stakeholder groups chose to only be added to the Task Force mailing list.

During the first quarter of 1996, the Task Force is scheduled to meet on January 16, February 20, and March 19.

- Discussions have been continuing between DOE and MDNR officials in an effort to resolve the notices of violation (NOV) issued by the state regarding stormwater discharge monitoring at SLAPS. During month of November, MDNR wrote a letter to DOE informing them that if DOE does not apply for a stormwater permit immediately, the state would refer the matter to the state Attorney General for legal action. Both DOE and the City of St. Louis continue to maintain that they are not legally obligated to obtain a stormwater permit.
- The Stone Container Corporation, tenant on property 2L adjacent to HISS, is planning an expansion of the parking lot at their facility. This will involve relocating approximately 12"-24" of soil from the southwest quadrant of the property to allow sufficient regrading for parking lot construction. Much of this soil is contaminated above the accepted cleanup guidelines; and Stone Container expects to place these soils, projected to range in volume from 1000-2000 cubic yards, into a covered, engineered pile at the rear of the property. Work on the parking lot expansion is expected to begin within the next few months.
- DOE/FUSRAP and MDNR representatives met on December 12 with representatives of local utility companies to discuss health and safety controls for utility workers performing excavations in areas of low-level radioactive contamination. Representatives from the St. Louis Sewer District, St. Louis County Water Company, Laclede Gas Company, and St. Louis Metropolitan Sewer District were in attendance. Discussions also centered on the disposal and handling of contaminated soils removed as part of routine excavations by the utility companies.

DOE explained that they could provide support to the utilities by determining the amount and concentrations of contamination in the area of excavation. DOE would also be able to provide limited health physics monitoring of personnel and equipment on a case by case basis. In regard to disposal of contaminated soils retrieved during excavation, DOE expressed that expense of the disposal of this material would have to be consistent with the goals of the St. Louis Remediation Task Force and recommended putting the contaminated soils back into the excavation where possible as an appropriate solution. DOE agreed to work with the utilities on case by case basis to resolve soil disposal problems. The group agreed to meet with DOE on a routine basis to discuss issues of concern.

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- DOE has negotiated a railroad tender(lease agreement) with the Norfolk Southern Railroad that will allow FUSRAP to use a Norfolk Southern property to support remediation activities at St. Louis vicinity properties. The provisions of this tender will provide for an area to stage and load contaminated material into gondola cars at their property on the corner of Eva Road and McDonnell Boulevard. This property is one of the SLAPS vicinity properties that has existing radiological contamination on it. Improvements will be made to the property which will include the installation of a rail spur to accommodate six gondola cars and miscellaneous grading activities to allow room for staging of waste prior to shipment. The site modifications will be completed by the end of March to support the Frost Avenue haul route remediation.
- In October, additional soil sampling was conducted along the contaminated portions of St. Louis vicinity property #32 (Fleischer Property) located on the northwest intersection of Hazelwood Boulevard and Seegar Industrial Drive in Berkeley, Missouri. The sampling was performed at the request of the property owner with the approval of the St. Louis Remediation Task Force.

As part of this resampling effort, five sampling grids were established along the previously identified contaminated area and composite samples taken consisting of 25 equally spaced discrete samples from 0 to 6 inches in each grid. Based on the characterization results, about 8 cubic yards of soil were found to be contaminated with thorium-230 above DOE guidelines for surface soils (11.9 pCi/g). While this concentration exceeds DOE's unrestricted use guidelines for surface soils (5 pCi/g), it should be noted that the value is below DOE's guideline for subsurface soils (15 pCi/g).

On November 28, DOE proposed to MDNR to disposed of the 8 cubic yards of contaminated soil at a permitted solid waste disposal facility within Missouri. MDNR's preliminary evaluation of this request indicated this would not be an acceptable disposal option; however, DOE and MDNR will continue to discuss the matter to seek clarification of legal interpretations.

- DOE is currently preparing an Engineering Evaluation / Cost Analysis(EE/CA)report for the St. Louis Area ballfield site. The EE/CA is being prepared to address remedial alternatives proposed by the St. Louis Site Remediation Task Force, including the possibility of capping the ballfields with a layer of cover soils. The EE/CA will describe potential actions and discuss the results of the evaluation of alternatives for remediating the ballfields, including the west site of Eva Avenue and the ditch along the north side of McDonnell Boulevard. The goal of this EE/CA is to develop an alternative that is protective of human health and the environment, and that allows a range of options for timely, beneficial reuse of the site. The EE/CA is expected to be completed and submitted for comment in the spring.

During this quarterly period, environmental sampling conducted by FUSRAP consisted of routine surveillance, radiological surveys, and sampling associated with ongoing site remediation activities. A summary of these sampling/surveying activities and the analytical results received to date is enclosed. As always, all raw data and analyses are available for EPA review and inspection to the extent that you request.

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During the first quarter of 1996, there are no scheduled FFA milestones. In the interim, DOE will continue to work with EPA and MDNR to implement appropriate interim removal actions and to facilitate the process of selecting the final cleanup remedy.

Please advise if you have questions or comments regarding this quarterly report.

Sincerely,



David G. Adler, Site Manager  
Former Sites Restoration Division

Enclosure

cc: R. Geller (MDNR)

00-1877

Formerly Utilized Sites Remedial Action Program (FUSRAP)

# ADMINISTRATIVE RECORD

for the St. Louis Site, Missouri



U.S. Department of Energy

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