



Department of Energy

Oak Ridge Operations
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April 28, 1995

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 JANUARY - MARCH 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 January through March 1995:

- There were no Federal Facility Agreement (FFA) milestones scheduled during this period; however, all other FFA-required activities were completed as necessary.

DOE provided EPA with an interim action plan of activities to be undertaken in the intervening months until a final remedy is selected. This interim action plan was submitted in mid-January.

- DOE received a request from the Missouri Department of Natural Resources (MDNR) for \$2.5 million in funding to cover the next five years of MDNR participation in review of FUSRAP activities. The state also indicated an interest in becoming a party to the FFA -- and it proposed a number of changes to the FFA. DOE has indicated a willingness to provide funding to MDNR to accommodate review of technical documents and MDNR's participation in stakeholder activities leading to a remedy selection. Because MDNR's suggested changes to the FFA were substantial, DOE has proposed providing funding to MDNR without the need for them to become a party to the FFA.
- During the first quarter, DOE completed the shipment and disposal of soils from the Fall 1994 cleanup of the St. Louis Airport Site (SLAPS) residential vicinity properties. The intermodal containers in which the soils were packaged had been staged at SLAPS pending approval from the

commercial disposal facility in Utah for the shipment of the soils. A total of 1,425 cubic yards of soil in 90 intermodal containers were shipped and disposed.

The St. Louis Site Remediation Task Force continued to hold monthly meetings in January, February, and March. Several task force working group subcommittees also met to evaluate specific areas of interest to the task force. The significant conclusions drawn by the task force to date include:

- A general agreement that the cleanup criteria (5/15 pCi/g for radium and thorium, 50 pCi/g for uranium-238) are protective and represent appropriate standards for St. Louis Site remediation;
 - A consensus that the cleanup of SLDS Plant 10 is a beneficial interim removal action contributing positively to the overall St. Louis Site cleanup objectives;
 - A consensus that cleanup of the pile of radioactively contaminated soil on Latty Avenue vicinity property 3L is a prudent interim removal action; and
 - A consensus that additional site stabilization activities at the St. Louis Airport Site are appropriate;
- DDE continued its efforts to evaluate technologies available for soil treatment. Soil samples collected from the North County area in the late summer continue to undergo laboratory testing to assess the characteristics that critically affect treatment methodologies. There has been sufficient promise to warrant further consideration and testing to identify treatment technologies that may have a potential for being successfully applied to the North County soils. DOE has also arranged to have the Department of Interior's Bureau of Mines review the SLDS soil data to assess the options for pursuing bench scale treatment tests on those soils.
- MDNR advised DOE of its intent to conduct a 30-day public comment period on the renewal of the Hazelwood Interim Storage Site (HISS) National Pollutant Discharge Elimination System (NPDES) permit. The current permit expired on December 31; however, because the MDNR review was not completed, MDNR advised that the current permit would remain in effect until a new permit is issued.

The renewal application was submitted to the state by DOE last June. The application included a request to modify the stormwater sampling requirements in a way that would maintain the same level of information generated to ensure protection of public health and the environment while at the same time saving over \$10,000 per year. However, the draft

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MDNR permit issued for public comment provides few significant changes in monitoring requirements from the previous permit.

- Discussions continue between DOE and state officials in an effort to resolve the matter of the notice of violation (NOV) issued by the state regarding stormwater discharge monitoring at SLAPS. In June 1994, DOE and the City of St. Louis each received a second NOV from the State of Missouri because neither party had submitted an application for a stormwater discharge permit for SLAPS to the state. Both DOE and the City of St. Louis maintain that they are not legally obligated to obtain a stormwater permit. In a July letter from senior DOE-HQ management to the state, DOE made clear its intent to conduct periodic monitoring of the site, but not to obtain a stormwater discharge permit for the site. Discussions are ongoing.
- During the first quarter, FUSRAP prepared engineering options for further stabilization of contamination at SLAPS. The primary area of concern is a radiological hot spot along the north fenceline. While there is no current land use scenario in which a member of the public could receive a radiation dose in excess of DOE's standard of 100 mRem/year, DOE has agreed to undertake measures to reduce the fenceline exposure levels.

DOE prepared a series of technical options and costs for the hot spot dose mitigation and presented them to stakeholders and regulators at the St. Louis Site Remediation Task Force meeting in February. There was no objection from the task force members and regulators at the February meeting to DOE's preferred choice of shielding the hot spot with clean soil. There was, however, some support from task force members for the option of shielding the hot spot with soils containing low-level contamination from the adjacent Berkeley Ballfields. This option was referred to the Task Force's Nearterm Priorities Working Group for further consideration; however, this group has not yet reached a conclusion on this option.

FUSRAP will also undertake other site stabilization measures at SLAPS, including additional erosion control and an upgrading and repair of sections of the perimeter fence.
- Representatives from FUSRAP and Mallinckrodt continued to meet on a weekly basis to plan and implement the removal action in Plant 10 at the St. Louis Downtown Site (SLDS). Mallinckrodt is currently in the process of dismantling buildings in Plant 10. This will clear the way for DOE to undertake the CERCLA removal action: excavation of an estimated 5,500 cubic yards of contaminated soil in that area. Mallinckrodt expects that the Plant 10 area would become a location for future expansion of its facilities if the area was decontaminated -- thereby contributing to the economic growth of the downtown St. Louis area.

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A limited field sampling effort was undertaken in early March to better define the boundaries of soil contamination and to characterize the exact composition of the soil waste stream for disposal purposes.

Mallinckrodt's building dismantlement will be complete in early June; DOE expects to commence the soil excavation in early July. The soils will be loaded into trucks at the Plant 10 site; the trucks will transport the soils to the east end of SLDS where the soil will be loaded into gondola rail cars for transport to Envirocare. If there is shortage of rail gondola cars, some soils may also be transported to Envirocare in intermodal containers.

FUSRAP is also preparing to undertake a removal action in North County along Latty Avenue. During Spring 1994, the tenant at 9060 Latty Avenue undertook an oil-contaminated soil remediation project that resulted in the construction of a storage pile containing radioactively contaminated soil on that property. The tenant had arranged for the remediation and removal of oil-contaminated soils on the property; however, soils that were contaminated with both oil and radioactivity were placed into the onsite pile that contains approximately 2,500 cubic yards. The tenant has subsequently vacated the property; a new tenant has begun to occupy a portion of the building on the property.

The radioactively contaminated soils will be excavated from the onsite pile and loaded into gondola cars and/or intermodal boxes for shipment and disposal at Envirocare. DOE expects to begin this removal action in June.

FUSRAP continued to undertake routine community relations activities at the DOE Information Center in Hazelwood.

During this quarterly period, environmental sampling conducted by FUSRAP consisted of routine surveillance, limited radiological surveys, and sampling associated with ongoing site activities. In addition, sampling was conducted to assist in the planning and waste characterization for the upcoming removal actions at SLDS and the Latty Avenue vicinity property. 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.

During the second quarter of 1995, there are no scheduled FFA milestones. DOE will continue to work with EPA and MDNR to implement appropriate interim removal actions and to facilitate the process of selecting a final cleanup remedy.

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Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for the St. Louis Site, Missouri



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