



Department of Energy

Oak Ridge Operations Office
P.O. Box 2001
Oak Ridge, Tennessee 37831-8723
November 28, 1995

Mr. Robert Geller
Missouri Department of Natural Resources
Division of Environmental Quality
P.O. Box 176
Jefferson City, Missouri 65102-0176

Dear Mr. Geller:

The purpose of this letter is to request Missouri Department of Natural Resources (MDNR) concurrence with a proposed cleanup measure in Berkeley, Missouri. This is in response to the recent St. Louis Site Task Force request that DOE evaluate cleanup options for property owned by Mr. Albert Fleischer on Hazelwood Avenue.

Recent sampling activities indicate that a small area of soil on the property contains thorium-230 levels marginally exceeding current DOE guidelines for unrestricted land use. Specifically, approximately eight cubic yards of soil adjacent to Hazelwood Avenue contain thorium-230 at an average level of 11 pCi/gram. While this concentration exceeds DOE's unrestricted use guidelines for shallow soil (5 pCi/gram), please note that the value is below DOE's guideline for subsurface soils (15 pCi/gram). If these soils were simply beneath six inches of clean cover DOE would not even be considering cleanup measures for the property. The existing condition presents no significant health threat; however, the property owner believes that removal of the soil will enhance the marketability of his property and eliminate misconceptions associated with perceived risks.

The lowest cost, and probably fastest approach to resolving this matter would be to excavate these soils and ship them to an appropriately managed solid waste disposal facility in the area. Due to unavoidable overexcavation, it is likely that thorium levels in the removed soil will be well below 11 pCi/gram, and within several pCi/gram of the natural background concentrations in St. Louis area soils. In any event, thorium concentrations present would not require Nuclear Regulatory Commission materials management licenses and would not trigger any special transportation requirements. I am unaware of any State regulations that would preclude these soils from being received at a facility designed for non-hazardous, non-municipal wastestreams.

Most importantly, relocation of these soils to a solid waste disposal facility would be an environmentally sound solution to the current difficulty faced by Mr. Fleischer. As I am sure you are aware, many waste streams containing comparably low levels of radioactivity (e.g., combustion ash, lead mining wastes, waste water treatment sludges) in Missouri are routinely disposed of in this manner. The operating and post-closure care programs in place for these facilities, presumably adequate to manage current inorganic waste stream constituents, would be equally adequate for management of these soils.

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Given the reliable controversy associated with managing any soils from the St. Louis site, however dilute, I would expect owner/operators of local landfills to premise acceptance of such soils on MDNR approval. In order to bring this matter to closure, please provide your response as soon as is practicable.

Thank you in advance for your assistance.

Sincerely,



David G. Adler, Site Manager
Former Sites Restoration Division

cc: Mr. Albert Fleischer
Mrs. Sally Price, Chairperson, St. Louis Site Task Force
Mr. Daniel Wall, United States Environmental Protection Agency

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SL-691

Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for the St. Louis Site, Missouri



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