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April 5, 1993

Mr. Thomas P. Grumbly
Acting Assistant Secretary for
Environmental Restoration and Waste Management
U.S. Department of Energy
Forrestal Building, Suite A014
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Dear Mr. Grumbly,

Congratulations on your new position with the Department of Energy. I wish you well in cleaning up the legacy of waste from 50 years of nuclear weapons production.

In Missouri we are still wrestling with the cleanup of the first waste of the nuclear age. The Mallinckrodt Chemical Works in St. Louis began to process uranium ore in 1942 for the Manhattan project. Contaminated materials resulting from the handling of wastes from that uranium processing from 1942 to 1956 are still scattered at many locations in St. Louis City and St. Louis County collectively known as the "St. Louis Site." The processing continued at the Weldon Spring Chemical Plant in St. Charles County from 1957 to 1966 resulting in contamination at that site.

The Missouri Department of Natural Resources (DNR) has been urging the U.S. Department of Energy (DOE) to clean up these sites for over 15 years. We have been pleased with the cooperative approach that the DOE has taken since 1988 regarding the cleanup of the Weldon Spring Site. That project is a serious effort to find protective and permanent solutions to the problems at the site. I also commend DOE for the effort to involve and inform the local community regarding the project. The DOE has given an appropriate policy and budget priority to the Weldon Spring Site Remedial Action Program.

Unfortunately, I cannot make the same evaluation of the progress at the St. Louis Site that is managed under the DOE's Formerly Used Sites Remedial Action Program (FUSRAP). In fact, I am

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completely opposed to the direction taken by the DOE's approach to the St. Louis Site. I believe that a large part of the problem is that FUSRAP program is managed as a low-budget, low-priority program. Indeed, the FUSRAP often seems to be the orphan of DOE's environmental restoration efforts. The DOE seems to assume that the sites in the FUSRAP are small, unimportant sites. Yet, in the specific case of the St. Louis Site, the waste volume is equivalent to that at Weldon Spring (over 800,000 cubic yards), the upper range of radionuclide contamination is generally higher at the St. Louis Site than at the Weldon Spring Site, and the waste is scattered in many locations in a highly urbanized area whereas the Weldon Spring Site is in an area surrounded by public lands.

In spite of the importance of the St. Louis site, the DOE has given the project a low priority. For several years we have made numerous requests that the DOE site manager be relocated to St. Louis in order to improve communication with the local communities. The DOE did open a public relations office in St. Louis but has continued to manage the project from Oak Ridge. The DOE's credibility in the local community is so low that even a proposed small expansion of the Hazelwood Interim Storage Site is being blocked by local officials.

In previous communications with the DOE regarding DOE's Five-year Plan for Environmental Restoration and Waste Management we have also commented on how the DOE manages the entire FUSRAP program as single budget item. As a result, the St. Louis Site is not guaranteed adequate funding to complete the project in a inappropriate or timely basis. Indeed, recent discussions with DOE personnel indicate that cost will be the primary criteria for remedy selection rather than completeness or permanency.

In the past year I have become particularly concerned with the direction taken by the DOE regarding the St. Louis Site. Last year the DNR objected to the consideration of "beneficial use" as means of disposal for contaminated soil. Under this concept, the DOE contemplated disposing of contaminated soil under newly constructed roads in the area or runways at the St. Louis-Lambert Airport. More recently, the DOE has considered consolidating waste from the other portions of the St. Louis Site at the SLAPS and then capping the site. This concept would involve leaving contaminated soil in place and in contact with groundwater at the St. Louis Airport Site (SLAPS). This approach would not provide the protection of groundwater that I believe is necessary. In addition, this approach cannot be considered a permanent solution since it requires continual monitoring and institutional controls to ensure that the groundwater is not used for drinking water purposes.

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I believe that any proposed remedial action at the St. Louis Site must be built on the confidence of the local community and provide for as permanent a solution as possible, isolate the waste from the environment (including the groundwater), and rely as little as possible on institutional controls. The DOE's recent strategies regarding the St. Louis Site do not meet these criteria.

To correct the problems at the St. Louis Site I believe that the St. Louis Site should be removed from the Formerly Used Sites Remedial Action Program and be instituted as a separate program similar to the Weldon Spring Site Remedial Action Program. Also, the project should be handled as a separate budget item. The site manager and key staff should be relocated to the St. Louis area. The DOE should then commit to working with the state and the local community to find credible, permanent and protective solutions.

I am very dissatisfied with the DOE's current approach to the St. Louis Site. Missouri has shown a willingness to work with DOE at the Weldon Spring Site. We have not demanded that DOE wastes be removed from Missouri. Unlike many other states we have worked to maintain a constructive relationship and we have tried to avoid litigation or a confrontational approach. I would prefer to maintain that cooperative relationship but DOE's approach to the St. Louis Site is in danger of making such a relationship impossible.

I look forward to your consideration of these issues.

Very truly yours,

DEPARTMENT OF NATURAL RESOURCES



David A. Shorr
Director

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