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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

APR 27 1995

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Mr. David G. 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: St. Louis Site - Comprehensive Interim Action Plan

We view the above referenced document (the Plan) as analogous to the United States Environmental Protection Agency's (EPA) Action Memorandum in that it defines the specific interim response actions or removal actions that DOE proposes to implement over the near-term. The DOE intends that the public documents already in place, i.e., the EE/CA for decontamination of properties in the vicinity of the HISS and the EE/CA for decontamination of the SLDS, provide the full supporting rationale for the actions outlined in this plan. The following comments are offered in this context:

1. The EE/CA documents present a scope of actions that we believe is appropriate to the near-term cleanup needs of the St. Louis Sites and generally consistent with the approach outlined in Tim Fields' letter of March 28, 1994, to Tom Grumbly. However, the proposed interim actions, in conjunction with the residential property actions already carried out, address only a portion of this scope of action. While we agree with DOE that no commitments for out-year activities can be made without knowing levels of funding, we believe it is appropriate to begin to define and prioritize appropriate response actions beyond what can be achieved with the current budget. We suggest that the Plan be expanded to take a more far reaching view, and that a process be described for updating and defining commitments on an annual basis as funding levels become known.
2. The approximate costs of the planned actions should be provided in the context of project funding so that a general evaluation of spending can be made.
3. Due to an evolution in thinking and available options, the proposed actions deviate somewhat from what was evaluated in the EE/CAs. While this is understandable, a process should be

developed for supplementing the EE/CAs with technical information as appropriate to support decision-making. For example, the planned disposal option for contaminated materials that are generated during cleanup activities was not considered feasible at the time the EE/CA was written. Also, the activities planned for stabilization of the SLAPS were not envisioned in the EE/CA. We suggest that technical information supporting these activities be put in the administrative record as information supplementary to the EE/CA, and that consideration be given to providing public notice of its availability, depending on the importance of the development.

4. Related to comment number 3 above, information should be provided that compares alternatives for the disposal and storage of contaminated materials from a cost benefit standpoint. While this information is not presented, it is our impression that a more comprehensive and cost effective cleanup strategy could be developed. Ideally, the cleanup approach would maximize the volume of contaminated materials brought into containment through the optimal usage of available storage and disposal alternatives. We recognize that, among other things, the St. Louis Sites Remediation Task Force plays a role in the decision process and that cleanup strategy will be constrained by factors other than funding level; however, we believe it important to the decision process to define the optimal approach.

5. The process by which actual work control documents will be developed and made available should be discussed. Also, the process for verifying and documenting completion of the action needs to be presented. The process for post cleanup sampling and verification should be described and referenced. An after action completion report or similar process should be described.

6. Broad schedules should be provided that show design, construction, and completion milestones.

7. In addition to the radionuclides, certain heavy metals were found in SLDS soils at elevated levels as indicated in Table 3 of the EE/CA for decontamination of the SLDS. It appears that exposure to these contaminants were not considered in the focused risk evaluation. No cleanup levels have been proposed for these contaminants, nor is any information provided showing that these contaminants will be addressed by virtue of being coincident with the radionuclide contamination. Please address or provide rationale for the current approach.

8. The decontamination/excavation process should be generally described, including discussion on technical constraints, such as the limitations of field instruments in defining cleanup. A practical discussion of how ALARA is applied in the field and its impacts on residual concentrations should be provided.

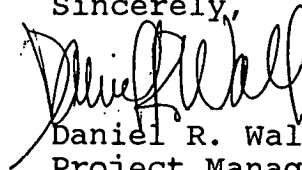
9. The EE/CA presents estimated risks to a hypothetical decontamination worker, but does not appear to present residual doses or risks based on the projected cleanup levels. The lack of a clear presentation of exposure scenarios and residual risks makes it difficult to comment on the adequacy of the proposed cleanup guidelines.

As you are aware, the EPA is developing a radiation site cleanup regulation that is still in the review process. It is our understanding that this regulation will provide for site specific cost-benefit analysis to be used in determining the appropriate level of residual radioactivity. Currently, EPA lacks clear guidance for use in evaluating the adequacy of the proposed cleanup levels. Until such time as the new rulemaking becomes final, we suggest that DOE concentrate on documenting the type, distribution, and concentration of residual radioactivity remaining after the cleanup action, and developing risk or dose levels based on maximum residual radioactivity using alternative exposure scenarios and all routes of exposure. The EPA will comment on the adequacy of cleanup based on this analysis.

10. The regulations contained in 10 CFR 61.41, 40 CFR 190.10(a), 191.03(a), and 192.41(d) all provide limitations on radiation dose to the general public, and should be cited and evaluated as potential ARARs.

Thank you for the opportunity to review these documents. Please call if you have any questions.

Sincerely,



Daniel R. Wall
Project Manager
Removal Enforcement Section
Superfund Division

cc: Bob Geller, MDNR

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Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for the St. Louis Site, Missouri



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