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## Department of Energy

Oak Ridge Operations  
P.O. Box 2001  
Oak Ridge, Tennessee 37831-8723

November 30, 1993

Mr. Daniel Wall  
Superfund Branch  
U. S. Environmental Protection Agency,  
Region VII  
726 Minnesota Avenue  
Kansas City, Kansas 66101

Dear Mr. Wall:

### ST. LOUIS SITES - BASIC FRAMEWORK FOR ADVANCING REMEDY SELECTION EFFORTS

The purpose of this letter is to propose a basic framework for advancing remedy selection efforts for the St. Louis FUSRAP sites. As you know, EPA recently requested that DOE complete several activities related to this effort including revision of relevant CERCLA documents, and implementation of a range of new field investigations. With this letter, I hope to identify agreeable terms for completion of these activities, so that we can proceed towards proposing and implementing a cost-effective protective remedy.

Before responding to specific requests, I feel I should restate my opinion that sufficient information is already available for near-term remedy selection needs. Because of this, I remain sensitive to scheduling commitments established by our Federal Facility Agreement and made to the public directly. Staying on track with these commitments will require that EPA and DOE publish a proposed plan for public comment this winter. I'm convinced that adequate performance, cost, and implementability information for this stage of the process is available.

Review of EPA's requests for additional field studies indicates that all of these requests can be met for around \$280,000, and be completed by the end of February 1994. In the interest of cooperation, I've initiated budget reallocation and field mobilization activities with the objective of meeting each of EPA's requests.

One of EPA's requests calls for additional sampling of groundwater for volatile organics in order to determine if current groundwater contaminants could diminish the containment properties of on site clays. Our assessment is that this is a remote possibility given that the concentration levels necessary to produce such an effect are orders of magnitude higher than levels observed on site. Nevertheless, we will complete the sampling and analysis as requested. My expectation is that this additional round of sampling will yield results similar to past characterizations; i.e., occasional detection of common industrial solvents at trace concentrations. Again, our conclusion would be that these detections do not significantly influence the remedy selection process.

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Other EPA requests call for groundwater level measurements, aquifer slug tests, and a series of aquifer pumping tests. We are taking steps to complete each of these activities, and expect results from these activities will further demonstrate that shallow groundwater at the site is separated from potential drinking water supplies by highly impermeable strata, and that there is no significant communication between these two zones on the western side of the site.

I remain concerned that no endpoints for many of these studies are evident. While we are preparing to complete the studies now, it is troubling that no specific criteria for evaluating resultant data have been proposed by EPA. Much of the information to be generated is not relevant to the subject of site suitability, but would be useful for remedial design activities if an on site remedy is ultimately selected. In any case, the absence of a defined process for using this information heightens the risk of indecision, and the possibility that additional technical studies will unnecessarily prolong issuance of a proposed plan. In my view, we are already pursuing studies that would more appropriately be completed as part of remedial design activities. Accordingly, I expect formal dispute resolution would be the appropriate process to resolve any additional significant requests for field studies.

If you have any questions, please contact me at (615) 576-9634.

Sincerely,



David G. Adler, Site Manager  
Former Sites Restoration Division

cc: Dan Tschirgi, MDNR

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Formerly Utilized Sites Remedial Action Program (FUSRAP)

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# ADMINISTRATIVE RECORD

for the St. Louis Site, Missouri

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