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Mr. James Wagoner
Director, Division of Offsite Programs
Office of Environmental Restoration
U.S. Department of Energy
656 Quince Orchard Drive
Gaithersburg, MD 20878

Dear Mr. Wagoner:

It has come to our attention that the Department of Energy (DOE) will be hosting a "stakeholders" meeting on August 8, 1994, to discuss available alternatives for the consolidation of radioactive material from several sites in and around the St. Louis area. One of the options being considered is a location commonly referred to as the SLAP site, located at the Lambert-St. Louis International Airport. This is the second time that we have become aware of a meeting regarding the SLAP site second-hand. It concerns us that the Federal Aviation Administration (FAA) appears to be overlooked in your consultation process. As a consequence, our interests and concerns may not be adequately factored into your decision-making process, potentially leading to the selection of a flawed alternative.

This issue first came to our attention in January of this year, when we learned from the St. Louis Airport Authority that your department had plans to hold a public workshop on the disposal of the radioactive waste. At that time, the Airport Authority requested that we attend this forum, but we declined, preferring to comment on such studies by communicating directly with the federal agency involved rather than in a public setting.

At that time, Moira Keane, of our Airports Division telephoned your contractor for the project, Gerald Palau of Bechtel, and David Adler of the DOE, to arrange a presentation for FAA on the alternatives being considered, with special emphasis on the SLAP site. As a result of those telephone contacts, Mr. Palau provided, in early February, an informational briefing for the FAA to discuss the options being examined and their feasibility.

The purpose of this meeting from our perspective was to initiate a dialogue with your department to ensure that FAA's concerns regarding the SLAP site were not overlooked. At the conclusion of the meeting, we felt confident that we had impressed upon Mr. Palau the importance of our concerns, as well as the potential ramifications that the consolidation of waste adjacent to the airport could have on airport operations. Mr. Palau

committed at that time: (1) to provide us with sufficient information so that we could initiate an "airspace analysis" on the alternatives being examined for the SLAP site; and, (2) to have as many meetings as needed to resolve any issues before going public.

An "airspace analysis" explores the impact on airport operations of any planned construction, such as effect on instrument approach minimums, interference to navigation and landing aids, and impact on future airport construction.

Ms. Keane telephoned Mr. Palau several times after the February meeting to inquire when DOE would be submitting the paperwork for the "airspace analysis." Mr. Palau indicated that the effort was on-hold for the time being as several federal agencies were not yet satisfied with the feasibility study, and that DOE itself was re-examining whether it would be preferable to transport the materials to a remote site.

You can imagine our surprise when, on July 19, 1994, we heard once again from the Airport Authority that DOE would be holding a "stakeholders" meeting with the public to examine all alternatives, including the SLAP site. We telephoned Mr. Palau, to again remind him that the DOE should be soliciting comments through the "airspace analysis" process from the FAA as an interested party.

The "airspace analysis" is not simply a paperwork exercise. We would like to emphasize that this analysis is important to the safe and efficient use of the nation's airspace. It is a federal requirement to file notice with the FAA of any construction of objects within certain distances of an airport. We recognize that filing notice of proposed construction or alteration is not required until 30 days prior to construction, thus triggering the FAA airspace analysis process. However, we had suggested that since the SLAP alternative is so controversial, it would be wise for DOE to complete the "airspace analysis" of that option to see if it is viable prior to discussions with the public. This analysis would provide information as to the potential ramifications choosing the SLAP site alternative could have on Lambert-St. Louis International Airport's aviation capacity and consequently, the airport's economic contributions to the metropolitan area.

We believe it is extremely important that the two agencies work together to find a solution that meets your needs without adversely impacting the flying public. In our view, we believe this is only possible by completing an "airspace analysis" on the SLAP site alternative. We stand ready to expedite this process. If you have any questions or need any further assistance, please contact our Special Project Officer for St. Louis, John Loughran, at (816) 426-6029.

Sincerely,

ORIGINAL FILED IN
HERMAN J. LYONS, JR.

Herman J. Lyons, Jr.
Acting Regional Administrator, ACE-1

cc:

Bob Dopuch, St. Louis Airport Authority

Gerald Palau, Bechtel

David Adler, DOE ✓

Manager, Kansas City Area Office

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