

FEB 1 1 49 PM '95

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

MEMORANDUM

January 23, 1995

David L. Feldman, Ph.D.  
Senior Research Associate  
University of Tennessee - Knoxville  
Energy, Environment and Resources Center  
327 South Stadium Hall  
Knoxville, TN 37996-0710

Thank-you for providing a copy of your report "Evaluating the Acceptability of Soil Treatment Methods in the Department of Energy's Formerly Utilized Sites Remedial Action Program: A Stakeholder Analysis," dated September 1994. The proposed survey forms was also included. We have given comments on the survey form to David Adler, DOE.

Regarding the report, we have concerns regarding the accuracy of information contained in the report. The Department of Natural Resources has been actively involved in reviewing and commenting on DOE proposals for the St. Louis Site. The references to the Department's position appear to be based on news media reports or other sources. Past comment letters or personal interviews are not referenced and do not appear have been used in writing the report. Because of these concerns, we request that the document not be portrayed as representing the Department's position on this project.

We have not commented on the specific information for sites outside of Missouri on pages 90 through 106. Examples of our comments are listed below. Some are general comments with regard to content of the report.

1. Executive Summary, page v. "Satisfying the concerns of federal and state regulators is problematic. Regulators want proof of treatment effectiveness, prefer time-tested technologies, and are concerned about residual contamination and management of the waste products generated by treatment."

These requests from regulators should not be problematic. These are reasonable criteria prior to acceptance of any remediation plan.

2. Executive Summary, page v, second paragraph. Cleanup levels will be approved as part of the CERCLA process at the St. Louis site and are therefore site specific.

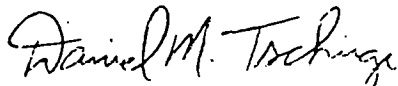
Mr. David L. Feldman  
January 23, 1995  
Page Three

12. Section 6.12, page 107. It is stated, "195,000 cubic yards of contaminated material are stored at HISS..." There are 13,000 cubic yards in temporary "storage" piles and the remainder of the contamination is in the ground.
13. Section 6.13, page 109, last paragraph. The "unofficial" division of site components referenced may be a logical division and the ultimate solution may involve this division, but the decision to "remediate as quickly as possible" the first component has not been announced by DOE. The DOE is currently seeking community input on this prioritization.
14. Section 6.15.2, page 112. The recreational development proposal referenced has not been announced by DOE. Again, the previous proposal by DOE would have utilized the space available for ballfields.
15. C.3 Chronology of St. Louis Sites, page 181. "1993: Missouri Department of Natural Resources attempts cleanup of contaminated sites, but city officials oppose action." The Department of Natural Resources would have advocated cleanup actions by DOE, but would not carry out the cleanup.
16. C.3 Chronology of St. Louis Sites, page 181. "1994 (Mar): Missouri DNR states that the design of the proposed bunker does not meet state standards. However, it also..." To my knowledge this statement did not appear in official Department correspondence and possibly was taken from a news media report. If so, it should not be taken out of context. The purpose of imposing design standards is to protect human health and the environment, not to force relocation of the waste.

We hope these comments will be helpful in your study. Thank you for the opportunity to comment on the report and the survey. Please contact Mr. Mitchell Scherzinger or myself at (314)751-3176 if you have any questions regarding our comments.

Sincerely,

HAZARDOUS WASTE PROGRAM



Daniel M. Tschirgi, P.E.  
Environmental Engineer  
Federal Facilities Section

c: Mr. David Adler, DOE

SL-472  
125967

00-1618

---

Formerly Utilized Sites Remedial Action Program (FUSRAP)

---

# ADMINISTRATIVE RECORD

for the St. Louis Site, Missouri

---



U.S. Department of Energy