

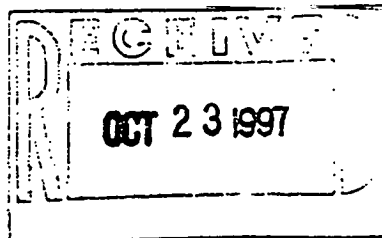
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SL-1304

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shorr, Director

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

October 16, 1997



Mr. Steve McCracken
Project Manager, DOE
FUSRAP Office
9170 Latty Avenue
Berkeley, MO 63134

RE: Comments on the Final Sampling and Analysis Plan for the
Hazelwood Interim Storage Site, Storage Piles, and the
Storage Pile on Latty Avenue Property No. 2 (September
1997)

Dear Mr. McCracken:

The Federal Facilities Section of the Missouri Department of Natural Resources has reviewed the above mentioned document for the purposes of determining if the plan contains the necessary information for MDNR to agree with the action to be conducted by DOE at HISS storage piles and storage piles on Latty Avenue Property No. 2.

The following suggestions, questions, and comments are based on the review of the Final Sampling and Analysis Plan for the Hazelwood Interim Storage Piles and the Storage Pile on Latty Avenue Property No. 2 (September 1997).

1. Page 1, paragraph 4 "Future" should be changed to "Futura." This change should be made throughout the document.
2. MDNR would like to see any results from any ground/surface water samples or radon monitoring as part of any environmental surveillance.
3. Page 6, paragraph 5, "These excavations resulted in additional radioactive soil and debris on the main HISS pile bringing the total pile." What does "bringing the total pile" mean in this sentence?
4. Page 9, 1a) Coverage of the accessible portions of piles' surfaces by scanning... What is meant by "accessible portions?" The gamma walkover is discussed later (page 14) in the document and indicates that the surveys will be performed over the surface of each pile.

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5. What is the time frame for the hole to remain open on each pile, i.e., hole patched? Will the repair be air tested?
6. Much discussion has been given to the following subject of determining "Background." This is a very important issue because many of the Investigative Action Levels are based on background. I believe this is an issue which must be addressed in the immediate future because so many things are based on background, e.g., cleanup standards, investigative action levels, etc. Currently, DOE is using background values provided by Bechtel/SAIC, but MDNR has also provided three locations to determine appropriate background values. It would be very helpful to determine what background values are obtained from the MDNR locations and compare them to values currently being used in actions at the FUSRAP sites.
7. Section 6.6 covers data reporting and it includes what will be reported but doesn't include who will receive the final reports.
8. There is some discussion of possible radon emissions from the piles but no discussion of any monitoring for radon or particulate matter. Some type of monitoring would be required to determine if PPE level B is appropriate for the workers and determine the exposure of workers in the area to possible increase in radon emissions or particulate matter.
9. The piles located at Latty Property No. 2 (Stone Container) were supposed to have been "inventoried" by Dr. Holmes, the owners consultant. This information could be helpful in the characterization study. Also, if DOE has a copy of that inventory, please provide a copy to this office.
10. The sampling plan doesn't clearly indicate what analysis is going to be run on the soil samples, e.g., Total VOC, SVOC. Also, it looks like the samples were not going to be analyzed for PCB's. If not, then why?
11. I believe the investigative action level listed in table 1 for Ac-277 should be Ac-227. Also, the levels for Ac-227 and Pa-231 seem high, so, could you provide copies of the reference document for these values, e.g., EPA 1991. Table 1 also leaves off Ra-228, why?
12. The storage piles at HISS and Latty Avenue Property No. 2 are not considered homogeneous because of the nature of construction. If DOE plans to use the results from this sampling effort to separate the HISS storage piles into below criteria and above criteria, the pile above criteria would be

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shipped to an off-site disposal facility and the below criteria pile would remain on site. MDNR would require more sampling to verify that the "clean" pile which could remain on site will meet the cleanup criteria for the site.

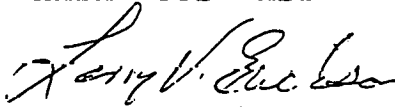
13. The following Missouri investigative action levels should be used in table 1:

Barium - 3,900 mg/kg
Lead - 240 mg/kg
Vanadium - 390 mg/kg
Silver - 280 mg/kg.

If you have any questions or comments, please contact Mr. Scott Honig at (573) 751-3087.

Sincerely,

HAZARDOUS WASTE PROGRAM


Larry Erickson
Chief, DOE Unit

LVE:shg

c: Dan Wall, U.S. EPA

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Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for the St. Louis Site, Missouri



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