

**Department of Energy**

Field Office, Oak Ridge  
P.O. Box 2001  
Oak Ridge, Tennessee 37831— 8723

August 17, 1992

Mr. Gregory D. McCabe  
Site Assessment and Federal Facility  
Section, Superfund Branch  
U.S. Environmental Protection Agency  
Region VII  
726 Minnesota Avenue  
Kansas City, Kansas 66101

Dear Mr. McCabe:

**DRAFT FINAL FIELD SAMPLING PLAN AND QUALITY ASSURANCE PROJECT PLAN FOR THE  
REMEDIAL INVESTIGATION/FEASIBILITY STUDY-ENVIRONMENTAL IMPACT STATEMENT FOR  
THE ST. LOUIS SITE**

Enclosed are three copies of the "draft final" version of the field sampling plan and the quality assurance project plan for the St. Louis site. A comment resolution package responding to EPA's comments on the March 1992 drafts of these documents is also enclosed. The resolution of the comments reflects the discussions that were held among EPA, MDNR, and DOE in St. Louis in early July.

Also enclosed for your reference are three documents referred to in the comment resolution package: (1) Mont Mason report; (2) environmental assessment associated with the NRC license renewal at Mallinckrodt; and (3) an excerpted section from SW-846. Please contact me at (615) 576-9634 if you have questions regarding this material.

Sincerely,

A handwritten signature in black ink, appearing to read "David G. Adler", is written over the typed name.

David G. Adler, Site Manager  
Former Sites Restoration Division

Enclosures

cc: C. Hickman, M&E  
D. Bedan, MDNR (w/6 copies)

## RESPONSE

The forecasted date for the first draft of this document to be submitted to EPA is June 1993.

2. DOE continues to maintain that it is not responsible for investigating certain areas of the site which it believes were not contaminated by MED/AEC activities. The issue is especially pertinent in those areas where radiological contaminants are of concern, eg., Plant 5 and the two waste pits located between Buildings 100 and 101 at SLDS. We have previously indicated to DOE that where it intends to limit its responsibility in accordance with the FFA, it should provide documentation which supports its position. Thus far, we have no such documentation, and consequently have no basis for concurring in DOE's proposal to limit its investigation of those areas in the FSP.

## RESPONSE

The response to EPA's comment on p. 2, ¶ 4 addresses this comment.

3. We again emphasize the need for sampling of property 56 in the area adjacent to Coldwater Creek.

## RESPONSE

It has already been investigated by the sampling activity described in the response to the specific comment on p. 53, ¶ 4.

4. The cause for the elevated gamma readings in Building 101 needs to be determined.

## RESPONSE

Historic data (i.e., old photos, design drawings, etc.) show that the building was constructed after MED/AEC activities ceased at MCW. DOE entered the building for one reason, to core drill through the floor because the building was constructed over areas known to have been associated with MED/AEC activities. While carrying gamma probes into the building (for downhole measurements, not building surveys) technicians noted an increase in counts. These counts increased as the probes were moved toward the drums that contained potassium reagents used in one of MCW's processes or sold by MCW. There is absolute evidence that the building was not used for MED/AEC activities; however, DOE will send a technician into the building to verify that the drums in the building are indeed filled with potassium reagents and that these are responsible for the high gamma readings detected in the building.

**FEDERAL  
EXPRESS**

August 27, 1992

ATTN: Missy Selber

FAX: 615 576-0956

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Greg McCabe  
US EPA Region 7  
726 Minnesota Ave.  
Kansas City, KS 66101

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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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U.S. Department of Energy