

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

December 3, 1996

Mr. David Adler
U.S. Dept. of Energy
P.O. Box 2001
Oak Ridge, TN 37831-8723

RE: Missouri Department of Natural Resources comments on documents entitled Quarterly Progress Report for Period July - September 1996 for the Formerly Utilized Sites Remedial Action Program (FUSRAP) St. Louis Site and Third Quarter Sampling and Analysis

Dear Mr. Adler:

The Federal Facilities Section of the Missouri Department of Natural Resources (MDNR) has reviewed the above mentioned documents and has the following comments and questions for your response;

Quarterly Progress Report for Period July - September 1996, for the Formerly Utilized Sites Remedial Action Program (FUSRAP), St. Louis Site

1. Page 1, Bullet 2, Paragraph 2, Sentence 6

- The MDNR has not yet concurred with the use of this material as backfill. A final is pending.
- The MDNR is requesting that the CERCLA, non-scheduled deliverable work plan for this activity be submitted for review and comment.

2. Page 2, Bullet 1, Paragraph 1, Sentence 1

- Although soils with elevated concentration of radionuclides have been left in place, they meet the limited recreational use, risk based scenario proposed.

3. Page 2, Bullet 1, Paragraph 1, Sentence 2

- Cleanup efforts achieved the limited recreational use, risk based scenario and not a supplemental guideline of 50 pCi/g.
- Clarify the meaning of the word "cleaned?"

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- The MDNR has in the past verbally requested that fill material be analyzed for chemical and radioactive contaminants, and that the FFS be provided with this information. I am taking this opportunity to formalize this request in writing.
4. Page 2, Bullet 1, Paragraph 1, Sentence 3
 - The use of the term "brown fields" is inappropriate. We strongly request that you not utilize this term in reference to St. Louis - FUSRAP sites.
 5. Page 2, Bullet 2, Paragraph 1, Sentence 1
 - Would either of these wastes in and of themselves preclude shipment without placarding, disposal at Envirocare, or be subject to any other regulatory requirements, prior to final disposal?
 6. Page 2, Bullet 5, Paragraph 2, Last Sentence
 - Change the word "group" to "Task Force."
 7. Page 3, First Full Bullet
 - Paragraph should reflect the fact that the MDNR referred this matter to the Missouri Attorney General's Office.

Summary of Third Quarter, 1996, Sampling and Analysis

Radon

The MDNR requests that this information be presented in an isotope-specific format. Should present sampling procedures preclude such analysis, the MDNR requests that DOE amend their procedures such that this data will be available for the quarter beginning January, 1997.

External Gamma Radiation

Due to the potential for misinterpretation, in the future please indicate that these samples were taken from fixed monitoring stations and not thermoluminescent dosimeters worn by workers in these contaminated areas.

Stormwater Surveillance

Paragraph 2, Indicate that the results of the stormwater analysis for SLAPS, which was not available for this report, will be incorporated into the report for the fourth quarter.

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Characterization Samples - North County

The statement that the site-specific risk-based criteria is 50 pCi/g for any radionuclide is inaccurate. The site-specific risk-based criteria (598 hours per year exposure at an excess risk to cancer no greater than 1×10^{-5}) equates to an exposure less than 13 μ r/h. The DOE used 50 pCi/g as an initial proposal for site remediation although this was not necessarily based upon a site specific risk-based criteria.

Post - Remedial Action Samples - North County

In reference to the area of contamination at 14 pCi/g for thorium-230, was further remediation conducted in the area and if not, why was the intent of the ALARA process not met?

SLDS, Building 116

It is stated, that the purpose of this survey was to determine if conditions are changing, but fails to state previous results. Amend text to incorporate a comparison of results.

Please direct your response to this letter to me. Also, if you have any questions or comments, please feel free to contact me at (573) 751-1968.

Sincerely,

HAZARDOUS WASTE PROGRAM

Mitchell C. Scherzinger
Mitchell C. Scherzinger
Environmental Engineer
Federal Facilities Section

RG:msg

c: Dan Wall, U.S. EPA

00-2208

Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for the St. Louis Site, Missouri



U.S. Department of Energy

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