

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 728 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

JUL 2 8 1892

Mr. David Adler
Former Sites Restoration Division
Department of Energy,
Oak Ridge Field Office
P.O. Box 2001
Oak Ridge, TN 37831-8723

anon mcabe
FPA
none (013)55157709

Dear Mr. Adler:

We have completed our review of the draft final Baseline Risk Assessment for the St. Louis Site dated May 1992. Under the terms of the SARA 120 Federal Facilities Agreement currently in place, we accept the draft final Assessment as final. We do however, have the following requests for additional clarification based on our review of the draft final Assessment and DOE's May 15 response to EPA comments on the draft Assessment. We ask that DOE provide a response to the following requests for clarification, either by incorporation into a finalized Baseline Risk Assessment or by letter:

p. 2-8, ¶ 2 - Why was thorium-232 removed from the statement that several nuclides were determined in the laboratory using alpha spectroscopy?

Response 1: An explanation of the derivation of dose from betagamma measurements on walls, as presented in Table 3.8, should be provided.

Response 6: In its response number 6, DOE considers and discusses only the increase in radon concentrations in household air on a time-weighted average basis, that occurs as a result of radon contamination in the ground water. The response still does not consider radon exposure that occurs while showering is in progress (analogous to the exposures to volatile organics in ground water while showering presented in Table 3.24). DOE should either include the showering scenario or explain in more detail why that is not appropriate.

Response 21: Tables 2.17 and 2.18 still carry no toxicity values for 2-butanone and chloroethane. The oral RfD for 2-butanone given in Table 2.16 is not the value suggested. Clarification should be provided.



2

ECOLOGICAL RISK ASSESSMENT COMMENTS

The ecological risk assessment portion of the document continues to indicate minimal effort on the part of DOE to identify and assess potential ecological impacts. At the time of remedy selection some reevaluation of potential ecological impacts as part of the ARARs evaluation may be necessary (e.g., the wetland west of the HISS).

Should you have any questions regarding our review, please contact me at (913) 551-7709.

STUCELETA AOULE

Gregory D. McCabe Site Assessment and

Federal Facilities Section

Superfund Branch

cc: Dave Bedan, MDNR

Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for the St. Louis Site, Missouri



U.S. Department of Energy

Property
of
ST LOUIS FUSRAP LIBRARY