STATE OF MISSOURI

Mel Camahan, Governor • David A. Shorr, Director

### DEPARTMENT OF NATURAL RESOURCES

- OFFICE OF THE DIRECTOR -

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NOV 27 1995

Mr. James Dwyer 4515 Maryland Avenue St. Louis, MO 63108

Dear Mr. Dwyer:

Thank you for your letter regarding the issues to be addressed over the next several years, by the St. Louis Sites Remediation Task Force and the Department of Energy. The Missouri Department of Natural Resources will work closely with the Task Force and the Department of Energy to ensure that the activities conducted at these sites are done with our complete involvement, participation and support.

It is critical that all parties clarify the issues and concerns as early as possible in order to obtain the greatest accomplishments and a "no regrets" policy toward the cleanup. With regard to the Priorities Working Group's recommendations, my staff was not provided with sufficient information regarding these tasks to make a complete recommendation to endorse the plan, thus we abstained.

You presented the recommendations from the working group as an attachment to your letter dated October 23, 1995. Although we have not seen the specific proposals for each of these activities, I will highlight some areas of concern and support for the recommendations as you have listed them.

1. Evaluate use of local disposal facilities for minimally contaminated soils.

At this time, this appears to be a reasonable task. We will review the information and analysis when it is provided by Department of Energy. A local commercial disposal facility must be identified that can legally and properly dispose of some of the minimally contaminated soils.

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## 2. <u>Identify and evaluate suitable location(s) for a new in-</u> <u>state disposal or interim storage facility.</u>

This task may be beyond the scope and the time frame available to the Task Force. The Department of Natural Resources neither supports nor opposes the efforts of the Task Force or Department of Energy to look for new instate disposal facilities. We will make our files and baseline environmental data available for your review and analysis in this process. If a new site is considered, it is essential that the community associated with the site be included in any planning. If an interim facility is identified, a specific time frame for final disposal must also be provided.

## 3. Remove contaminated soils from haul route properties in North County.

We fully support the effort to remove contaminated soils from impacted public and private properties that provides for their continued use without restrictions.

#### 4. Restore and stabilize Airport-Owned properties

The cleanup and stabilization of the areas affected by the St. Louis Airport Site are crucial to the complete remediation. As previously noted, we must proceed with a "no regrets" policy in addressing these sites. It is unclear whether we will accept covering contaminated ball fields with clean soil as a final remedy. This situation is similar to actions taken at hazardous waste sites and we must ensure that appropriate institutional controls exist if any waste is left in place.

## 5. Continue cleanup efforts at the St. Louis Downtown Site (SLDS)

We fully support the restoration of these areas.

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6. <u>Continue soil treatability investigation for the St. Louis Site.</u>

We support the continued assessment of a new or existing technology that could assist in enhancing the overall remediation of the project. It appears feasible to reduce the volume of the waste by better characterization, possible physical or chemical separation of waste materials, or stabilization of remaining contaminates.

We will continue to evaluate our position as this department receives additional information. Again, I appreciate your bringing these issues to my attention.

Very truly yours,

DEPARTMENT OF NATURAL RESOURCES

David A. Shorr

Director

DAS:rga

c: Sally Price, Chairperson SLSRTF Dave Adler, DOE Formerly Utilized Sites Remedial Action Program (FUSRAP)

# ADMINISTRATIVE RECORD

for the St. Louis Site, Missouri



U.S. Department of Energy