INTER-OFFICE MEMO

TO: David Adler

FROM: David Miller

DATE: 20 July 94

SUBJECT: EPA QUARTERLY MEETING HELD IN ST. LOUIS ON 14 JULY 94.

The following information is transcribed from the notes I made during the EPA quarterly meeting held from 10:00 a.m. to 1:00 p.m. at the DOE Information Center on Latty Avenue in Hazelwood, MO on Thursday, 14 July 1994.

Participants:

David Adler	DOE	Deview	 Robert Geller	MO DNR
Daniel Wall Karen Flournoy	•	-	Daniel Tschirgi Mimi Garstang	MO DNR MO DNR
Patti Hazel	DOE	j	 David Miller	SAIC

D. Adler opened the meeting by asking for agreement on three "truths" to be presented at the Senior Stakeholders' Summit. The truths were: 1) multiple agencies studied the current site risks and no imminent dangers exist; 2) to date, there is no evidence that the deep groundwater is contaminated and no imminent threat to the deep groundwater or high productivity aquifers exists; 3) the shallow groundwater doesn't present an imminent threat. The group voiced no disagreement with these "truths." However, M. Garstang indicated that it is important to recognize that the shallow groundwater has been impacted and she asked to see a compilation of the groundwater quality analyses performed at the site.

D. Adler suggested interim alternatives to be considered for FY 95 while a preferred alternative is being selected. They included the stabilization and monitoring of SLAPS (which will definitely be done) and clean-up of the residential properties shipping the contaminated soil to Utah. D. Wall asked for detailed information regarding the clean-up of the residential properties including the volumes of soil to be excavated, the cost of the actions, and identification of the specific properties to be remediated.

R. Geller stated that he would like to see a detailed outline of the information that D. Adler would be presenting at the summit so that as much inter-agency agreement as possible could be obtained on the sensitive issues prior to the meeting. He noted that if D. Adler presented previously agreed on positions, then MDNR and EPA officials would not be forced to challenge such items and the agenda of the meeting would be facilitated in that larger issues could be focused upon. He specifically asked about what D. Adler would be saying about risk. D. Adler commented that, although there are notable exceptions, he assumes that the higher level stakeholders have very little information other than the fact sheet that will be provided. He also noted that it was his feeling that if Assistant Secretary Grumbly could find consensus among the congressmen, then Assistant Secretary Grumbly would likely proceed.

R. Geller indicated that all property owners should be notified of the stakeholders' summit.

D. Adler noted that an EE\CA may be necessary for non-time critical, interim dose reduction measures.

R. Geller requested that MDNR and EPA be kept apprised of the soil treatment plans at St. Louis. They would like to see copies of the Request for Proposals and the Field Sampling Plan. D. Adler indicated that they would receive this information and recognized that they should be kept up-to-date on treatment activities stating that the only reason that they hadn't seen anything until now was because of the rapid pace with which the treatment program had been implemented.

Re: 2nd Notice of Violation for failure to obtain stormwater permit for SLAPS. D. Adler indicated that he had informed headquarters DOE of the situation and was waiting for their response.

D. Adler asked for clarification from the EPA regarding the substantive contents of the Record of Decision (RoD) for the St. Louis site. D. Wall responded that a "place holder" RoD will not be considered adequate, and that it makes sense to do an interim RoD because there are a lot of potential interim actions. He also indicated that the "off-site" properties (e.g. not SLAPS or HISS) be prioritized based on access and the likelihood of disturbing the contaminated materials.

D. Wall indicated that if the EPA received a strategy and timetable from DOE, then a schedule extension might be possible. D. Adler emphasized that if DOE does not receive relief from the current milestone for the RoD submittal, DOE will have no choice but to submit a draft document this September--even if the document can only propose limited clean-up measures at that time. All agreed that a preferable "path forward" would be to define substantive near and longer-term remedial strategies, then to codify these strategies into a meaningful RoD.

Synopsis of items requiring action.

1) Provide MDNR and EPA with an outline of the information (especially risk) to be presented at the 08 August Senior Stakeholders' Summit by 22 July.

2) Identify the specific properties and provide volume and cost estimates for properties that may be targeted for interim clean-up.

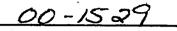
3) Notify all property owners of the upcoming Senior Stakeholders' Summit.

4) Determine whether or not an EE\CA will be required for interim clean-up measures.

5) Provide MDNR and EPA with information regarding treatment activities at the St. Louis site including the RFP and FSP.

cc:	D.	Wall	USEPA
	D.	Tschirgi	MDNR
	J.	Waddell	
	т.	Patterson	
	G.	Palau	BNI

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Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for the St. Louis Site, Missouri



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