#### MINUTES OF LOCAL PRIORITIES WORKING GROUP

#### April 26, 1995

The meeting was called to order at approximately 9:40 a.m. Those attendance were:

Jean Montgomery, Mayor of Berkeley David Braun, Union Electric Jan Titus, Lambert Airport Jack Frauenhoffer, Mallinkrodt Thomas Manning, City of Hazelwood Tom Binz, Laclede Gas James Dwyer, Facilitator Lorraine (Lori) Batton, City of Berkeley Robert Shelton, City of Berkeley (arrived later in the meeting)

Mr. Dwyer advised that the minutes of the two previous meetings would be forthcoming, but were not yet ready for distribution.

The group considered the request of RYKOFF-SEXTON, INC., as described in correspondence dated April 25 from James Iacobazzi to James Dwyer, that the working group recommend to the DOE that cleanup of the former Clark Food Services property at 8979 Seeger Industrial Drive (Berkeley) be scheduled and funded.

Following extensive discussion it was agreed unanimously that:

The site meets the criteria established by the Task Force, and should therefore be considered for cleanup;

Additional information is required to evaluate the priority of this 2. project, including estimates of volume and radioactivity of contaminated material, proposed disposal methods, projected cost of cleanup, and the timing and exact location of the proposed expansion of the existing facility.

The Working Group will recommend to the Task Force at its meeting on 3. that the DOE be requested to proceed promptly with the May 9 characterization work required to respond to the aforementioned concerns, using FY95 funds;

The Working Group will then review that information and will consider 4. the subject site for inclusion in its recommendations for FY96 cleanup projects.

Mr. Shelton made a motion, seconded by Mr. Manning, to accept the above proposal. Motion carried. Mr. Dwyer stated he would pass the information promptly to the Task Force for consideration at the May 9 meeting, and Mr. Shelton was to respond to the applicants.

(For Mr. FRAVENHOFFOR'S bevert) Mr. Dwyer advised that the City of St. Louis and Lambert Airport have agreed to a DOE proposal for interim improvements to be made at SLAPS utilizing \$500,000 of FY95 funds. The proposed measures respond to concerns raised by EPA and MDNR in 1994, and are intended to reduce gamma radiation emanating from "hot spots" near McDonnell Boulevard and to reduce soil erosion, by installing a fabric barrier over a small portion of the site and covering it with 5,000 to 7,000 cubic yards of imported clean dirt.

Mr. Dwyer reported that Kay Drey had called him to express her concern that the proposed measures would inevitably result in increased volume of contaminated material, and that the investment in improvements would tend to justify the notion that SLAPS should be designated a permanent disposal She expressed her opposition to the proposed measures and requested site. consider her thoughts before developing a final that the group She suggested that one possible better use of recommendation on the plan. the \$500,000 budgeted for this project would be to commence an effort to locate and qualify a statewide disposal facility somewhere in Missouri.

Following extensive discussion it was agreed that additional information is required to enable the working group to develop a recommendation on these matters.

It was also agreed the Local Priorities Working Group needs participation by a DOE representative who can translate data, define and describe relative risks, and otherwise assist in its work on an ongoing basis. Mr. Dwyer agreed to convey this request to Dave Adler.

A general discussion was held regarding decisions of the Task Force and Working Groups and whether changes could be introduced to amend decisions Mr. Dwyer advised that proposals to amend decisions are already made. eligible for consideration. Discussion ensued concerning what circumstances would justify a proposal to change a decision (e.g. incomplete information, new information, change of circumstance, etc.), and what the implications of a change might be. It was agreed that each circumstance would have to be evaluated individually on its merits.

Mr. Frauenhoffer distributed a working draft of a document for use by the group in the study process in establishing priorities. (Attachment No. 1)

Ms. Manning reported that the City Gouncil of Hazelwood had voted to deny the importation of net additional volume of contaminated material, and to accept only containerized material for transshipment.

It was discussed and agreed, for purposes of establishing priorities, that each component of the St. Louis Site will be individually identified and evaluated based on volume, degree and type of contamination, cost to cleanup, etc.

"Institutional Controls." draft of revised Mr. Binz distributed а (Attachment No. 2) to be discussed at the next meeting.

A brief discussion was held regarding the National Stakeholders Meeting.

The next meeting of the Group was scheduled for Wednesday, May 3, 9:30 a.m. at Berkeley City Hall.

Meeting adjourned at approximately 11:50 a.m.

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### St. Louis Site Remediation Task Force - Local Priorities Work Group

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COLD WATER CREEK

| SITE             | USE | VALUE | COST     | DEGREE OF ,<br>CONTAMINATION | VOLUME<br>CY | PEOPLE<br>EXPOSED (#) |
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| ICINITY PROPERTY |     |       |          |                              |              |                       |
| OLD WATER CREEK  |     |       |          |                              |              |                       |

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#### What is an "institutional" control(s)?

EPA expects to use institutional controls such as water use and deed restrictions to supplement engineering control as appropriate for short term management to prevent or limit exposure to hazardous substances, pollutants, or contaminants. Institutional controls may be used during the conduct of the remedial investigation/feasibility study and implementation of the remedial action and, where necessary, as a component of the completed remedy. The use of institutional controls shall not substitute for active response measures (e.g., treatment and/or containment if source materials, restorations of groundwaters to their beneficial uses) as the sole remedy unless such active measures are determined not to be practicable, based on the balancing of trade-offs among alternatives that is conducted during the selection of remedy.

Active institutional control means: (1) Controlling access to a disposal site by any means other than passive institutional controls; (2) performing maintenance operations or remedial actions at a site, (3) controlling or cleaning up releases from a site, or (4) monitoring parameters related to disposal system performance.

Passive institutional control means: (1) Permanent markers placed at a disposal site, (2) public records and archives, (3) government ownership and regulations regarding land or resource use, and (4) other methods of preserving knowledge about the location, design, and contents of a disposal system. EXAMPLES:

I. Légal Controls

- A). Deed restrictions
- B). Contract
- C). Consent Decree/Administrative Order of Consent
- E). Record of Decision
- F). Permits
- G). Zoning Ordinances
- H). Code of Federal Regulations
- I). Brownfield Legislation
- **J)**.
- **K**).

II. Administrative Controls

- A). Fence/Signage/Security System
- B). Restricted Access/Sign-in Sign-out Procedures
- C). Personal Protective Equipment/Respirators, etc.
- D). Lock out Tag out Procedures
- E). Education & Training
- F). Monitoring
- G). Compliance with the Regulations
- H). Policies and Procedures
- **I)**. 1

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## III. Engineering Controls A). Capping/Sh

- **B**).
- **C)**. .
- D).
- ng Controls Capping/Shielding Slurry Walls Containerization Treatment Systems Minimization or Consolidation Storage Cells/Bunkers Remedial Action Soil Washing E).

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- **F)**.
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12 089809081010Documentation of Other Public Meetings

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Formerly Utilized Sites Remedial Action Program (FUSRAP)

# ADMINISTRATIVE RECORD

### for the St. Louis Site, Missouri



U.S. Department of Energy

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