

MINUTES

St. Louis Site Remediation Task Force

May 21, 1996 Meeting

Hazelwood Civic Center
Hazelwood, Missouri

APPROVED

Participants Attending

Dave Adler, DOE
 Tom Binz, Laclede Gas Company
 Ric Cavanagh, St. Louis County Health Dept.
 Kay Drey
 George Eberle, Grace Hill Neighborhood Assn.
 Jack Frauenhoffer, Mallinckrodt Chemical Co.
 Anna Ginsburg, Vice Chair
 Jim Grant, Mallinckrodt Chemical Co.
 Leonard Griggs, Lambert Airport
 Tom Horgan, U.S. Rep. Talent's Office
 Theodore Hoskins, City of Berkeley
 Du Jearls, City of Florissant
 Donovan Larson, St. Louis County Water Co.
 Nancy Lubiewski
 Tom Manning, City of Hazelwood
 Bob Marchant, Metro. St. L. Sewer Dist.
 Sally Price, Chair
 Roger Pryor, Coalition for the Environment
 Josh Richardson, City of Berkeley
 Conn Roden, St. Louis County Health Dept.
 Ray Rolen, City of Bridgeton
 Elsa Steward, MDNR
 Dan Wall, EPA

Dave Miller, SAIC
 Sarah Snyder, FUSRAP

Other Interested Parties

Ken Albin, Bechtel
 Wayne Black, St. Louis County Health Dept.
 Chuck Blumenfeld, Dawn Mining Co.
 Bradley Brown, St. Louis County Water Co.
 Molly Bunton, County Executive's Office
 Gonzalo Corvera, Corvera Abatement Tech.
 Margaret Gilleo, Sierra Club
 Bob Geller, MDNR
 Mark Gibson, Dawn Mining Co.
 Ken Grothoff, Wagner Brake
 Peggy Hermes, Coalition for the Environment
 Ward Herst, Golder Associates
 Charles Judd, Envirocare of Utah
 Paul Kos, Stone Container Corp.
 Ron Kucera, MDNR
 Laura Madden, Bracy Williams & Co.
 Ed Mahr, Jr.
 Linda Meyer, WSSRAP
 Les Price, DOE-FSRD
 Tom Shepherd, Dawn Mining Co.
 Jan Titus, Lambert Airport
 Robert Wester, R.M. Wester & Associates

Support

Jim Dwyer, Facilitator

Agenda ItemMinutesDetermination

Welcome, Opening
 Comments,
 Announcements

Chair Sally Price called the meeting to order
 at 7:45 a.m. and asked if there were any
 comments or announcements.

Jim Dwyer announced several roster changes. Conn Roden will represent St. Louis County in place of Joe Cavato, who has left his position with the county, and Neil Slaten will represent Union Electric in place of Eileen O'Connor, who has moved to Chicago.

Mr. Dwyer also introduced Kenneth Albin, the new project manager for Bechtel. Mr. Albin replaces Gerry Palau, who has been reassigned.

*Approval of
Minutes*

Mr. Dwyer asked if there were any proposed revisions to the draft minutes of the April 16, 1996 Task Force meeting. Amendments were proposed and adopted. The minutes of the April meeting were approved as amended.

**The minutes of the
April 16, 1996
Task Force
meeting were
approved as
amended.**

*Opportunity for
Public Comment*

Mr. Dwyer asked if there were any public comments. There were none. He then introduced Les Price, director of DOE's Former Sites Restoration Division, who had requested an opportunity to address the Task Force at today's meeting.

*Les Price
Comments*

Mr. Price thanked all Task Force members for their commitment and dedication, especially those who serve as unpaid participants. He said he wanted to come to this meeting for several reasons.

First, he said, DOE proposed this Task Force process about a year and a half ago in order to obtain advice regarding the St. Louis Site from more than just DOE staff, its contractors, and Federal and State regulators. DOE asked the Task Force to develop recommendations concerning an overall cleanup plan. Around the same time, DOE's Environmental Management Advisory Board (EMAB) also set up a committee to consider similar issues related to FUSRAP on a national scale, and to develop policy recommendations. It was hoped that the EMAB FUSRAP Committee would by this time have developed guiding principles for the Task Force to consider, but that is not

the case. The schedule now is for the FUSRAP Committee to present draft recommendations to EMAB this Fall, followed by a public comment period. In the meanwhile, the Task Force must work without the benefit of national guidelines. In the absence of such guidelines, DOE thought it appropriate to advise the Task Force on the DOE perspective.

His second reason for wanting to address the Task force was because there has been speculation in recent months that DOE may somehow be manipulating this group. Instead, he said, he thinks DOE has withdrawn too much from discussion of substantive issues and has not shared its perspective sufficiently with the Task Force. Mr. Price said he has asked Dave Adler to participate more fully and to share his views, and let the debate on the issues continue, because sound decisions can be made only if all interested parties participate fully in the process.

Mr. Price said a third reason for addressing the Task Force today is to share some observations about recent trends in the federal government, especially with respect to the budgeting process and the failure of Congress last fall to reach agreement on appropriations until very late in the process. He said environmental cleanup generally has been considered a discretionary part of the budget and that many questions have been posed and issues raised during the budgeting process. One such issue is risk analysis. He said Congress is considering questions such as why are we cleaning contaminated sites and to what levels? Accordingly, risk analysis has become very much a part of the budget debate.

He said another trend that is occurring is a new emphasis on identifying cost-effective remedies. Mr. Price said the federal government is creating a national remedy review board. Under this review process, if EPA has the lead on a site and proposes to

implement a remedy at a cost greater than 110 percent of the lowest cost protective remedy, it will have to take its case to this national board. This development has put new pressure on project managers and contractors to be cost-effective.

He said DOE expects federal budgets to continue to drop. So far that has not been true for FUSRAP, but it is nevertheless a trend that should be considered, he said.

"So what does this mean for St. Louis," he asked. "Does it mean that DOE cannot support complete excavation and out-of-state disposal of the wastes?" He said that in the terminology of his boss in Washington, "that would be a really heavy lift." He said his judgment is that DOE/Oak Ridge would not support that kind of recommendation to HQ and that HQ would not support that recommendation in the budgeting process, because "we have to look harder at where the risk is." "Simply excavating everything and shipping elsewhere for disposal is an understandable desire," he said, but he is not sure it is going to pass the test of being a realistic remedy that is cost effective. Mr. Price said he would be derelict if he did not share that perspective with the Task Force.

He acknowledged that perhaps something could change the way such decisions are made, but at present the cost to excavate all contaminated material above guidelines would be prohibitive. He expressed the belief that there is a good solution that is affordable for the St. Louis Site, and acknowledged that finding it is a big challenge. He said he believes the Task Force is up to that challenge.

Mr. Price then asked if there were any questions or comments.

Nancy Lubiewski said she is a volunteer on the Task Force and that she doesn't appreciate Mr. Price's message this late in

the process. She said she will not recommend a cleanup that is less than the best possible and that she would fight for complete cleanup of the St. Louis Site.

Kay Drey said she agreed with Ms. Lubiewski. She also asked Mr. Price if DOE had decided to use another, less stringent cleanup standard than the established 5/15 pCi/g.

Mr. Price said those guidelines are "pretty low values for the kind of risk here." He said Ms. Drey was asking a question that EPA and DOE have been struggling with, *i.e.*, to determine what levels and rad doses are acceptable. He said he was not trying to suggest any change in the guidelines.

Mayor Hoskins said it seems that DOE has not moved from its original position of not wanting to remove the contamination from the region. He said anything less than complete cleanup is not acceptable.

Tom Horgan asked if DOE had decided it will not explore the option of complete cleanup, even if it could be accomplished within reasonable budget parameters.

Mr. Price said DOE has not ruled that out entirely. The cost of total excavation and remote disposal is an option that should be estimated again, especially because of the emergence of new competition in the market place for disposal.

Elsa Steward asked if DOE is now less committed than previously to obtaining approval of state regulators (MDNR) for cleanup programs at the St. Louis Site.

Mr. Price said DOE is not backing away from its commitment to the state regulators. However, he said EPA is the lead regulator in this instance and has final approval for cleanup of the site. He said that DOE won't proceed with a remedy the State of Missouri doesn't support. But that doesn't mean that

DOE doesn't have a role in determining the remediation process as the responsible lead agency.

Roger Pryor said that prior to last month he was uncertain how the overall group would vote. To his surprise and pleasure, the vote in April was overwhelmingly in favor of "moving the stuff out." He said he was offended that Mr. Price "would now tell the Task Force that won't work, after we've reached pretty strong consensus." He said he thinks DOE has outlived its usefulness.

Sally Price said that after hearing Mr. Price's comments, and knowing what the state (MDNR) requires in terms of cleanup guidelines, she is in a quandary. She said it would be very difficult to recommend a remedy that state regulators have said they can't support, or on the other hand to propose a cleanup program DOE says it won't support.

Ray Rolen said he doesn't have as many criticisms of DOE as some. He said there are some sites that have been over emphasized and that Bridgeton believes there is some remediation work that cannot be done safely. He said he thought people got over-excited when voting on preferred remediation options (at last month's meeting) and that DOE has excellent risk analysis capabilities to assess the hazards associated with remedial action work compared to leaving contamination in place.

Mr. Price said more attention is now being given to the risk associated with cleanup activities, whereas in the past DOE mainly considered residual risks. Now DOE evaluates the risks associated with transport and excavation as well, he said.

Donovan Larson observed that the technical support and information needs of the Task Force have not been entirely supported by DOE, in his estimation. With respect to questions about how to deal with the safety

of water company employees, he has found that DOE is not clear in its commitment to support these efforts. After spending more than a year talking about various approaches to remediation, the evidence seems to be that some sort of on-site disposal and piecemeal handling will not be successful in meeting the day-to-day needs of the community, which is what he thought drove the Task Force to vote for the complete cleanup option in most instances. In the absence of a strong argument that it is safe to leave the contaminated material in St. Louis, he believes the Task Force has made a reasonable decision.

Jim Grant said that he has seen no evidence of the Task Force being manipulated. He added that until the Task Force has evaluated cost and risk information for each of the remediation options, it cannot finish its work. The polling in April was premature in that respect, he said.

Dave Miller advised that the cost estimates for each option are available today, but the risk assessment information is not yet ready. He said he hopes to be able to mail it to the Task Force soon.

Bob Geller said that, as he looks back at the history of the Task Force, he remembers the EMAB meeting where Tom Grumbly spoke. He recalls that Mr. Grumbly proposed to turn the process around and to empower the community to make its own decisions and to develop its own recommendations to DOE. Now, he said, he is hearing that DOE does not want to consider what the Task Force has proposed.

Mr. Price said DOE wants to know as clearly as possible what the views of the Task Force are, and that hasn't changed from what Mr. Grumbly said on August 8, 1994. On the other hand, he said he would be derelict if he didn't convey to the Task Force DOE's perspective on the political and economic climate for those

recommendations. He said the Task Force should consider future land use and risks, and should factor those into the decision making process. He said DOE doesn't believe the risks posed by the presence of the contaminated material in St. Louis provide a basis for supporting total removal of all contaminated material. That doesn't mean the Task Force shouldn't recommend what it wants to recommend. But, he said he thought that DOE had not presented its views as clearly as it should have. To its credit, he said, the state (MDNR) has given its views and that is healthy and constructive, as it should be.

Ron Kucera expressed surprise at some of the things Mr. Price had said. He pointed out that the state (MDNR) works very closely with EPA. He also said that about 98 percent of the St. Louis waste is on private property and not on DOE property. It's one thing, he said, for DOE to say it will accept remediation resulting in less than greenfield conditions on property it owns. But it is another thing for DOE to suggest that it is going to leave contamination in place on private property.

Ms. Drey said that when the Task Force ranked criteria it felt were important for developing cleanup recommendations, health and safety were at the top and cost at the bottom. "We need to remind Washington D.C. that part of the cost of making nuclear weapons is cleaning up afterwards," she said.

Chuck Blumenfeld, representing Dawn Mining Co., asked Mr. Price whether, if the Task Force ultimately recommends total excavation and remote disposal as the cleanup remedy for the St. Louis Site, and either U.S. Senator Bond or U.S. Rep. Talent says "we're prepared to appropriate money for this," DOE would then support the recommendation?

Mr. Price said that "if Congress says this kind of problem deserves that kind of remedy, and in the balancing of national priorities that is appropriate, DOE will do as directed by Congress." But Mr. Price said that direction has not been provided, which is why DOE has sought advice from EMAB, which he described as a high-level advisory committee to DOE.

*Coldwater Creek
Panel Report(s)*

Mr. Dwyer noted that Task Force participants should have received copies of the Coldwater Creek Panel's final report, Mimi Garstang's initial addendum report, MDNR's combined version of the two reports and Angel Martin's summary memo. He asked if there were questions concerning any of those documents. There were none.

*Priorities Working
Group Report*

Mr. Dwyer also said the Task Force should have received, either by mail or fax, a copy of the interim report of the Priorities Working Group in which proposed cleanup priorities for the entire St. Louis Site are recommended.

Ms. Drey said she had a criticism about the draft report because it did not reflect that some members of the working group had expressed very strong objections about spending any money on interim actions.

Mr. Dwyer advised that the Priorities Working Group had nevertheless identified stormwater control measures at SLAPS as a potential interim action and that the working group plans to meet again on May 22 to discuss allocation of the funds previously set aside for the ballfields cleanup in FY '96.

Sally Price asked whether copies of George Eberle's letter in support of cleanup of the Riverfront Trail using the ballfields money could be distributed to the Task Force. Copies were made and distributed.

Mr. Eberle said that the Riverfront Trail project has progressed much faster than was anticipated. He said the trail is scheduled to

be completed by the end of this year and that some contamination needs to be cleaned up in the vicinity of SLDS to allow its completion.

Ms. Lubiewski requested details concerning stormwater runoff controls that could be implemented at SLAPS.

Dave Adler said one possible approach would be to implement simple measures to reduce the transfer of sediment into Coldwater Creek. Among the potential options are actions to minimize contact between rain water and contaminated material or to slow down the rate of flow so sediment settles out prior to discharge into Coldwater Creek. These are fairly routine practices, he said.

Ms. Lubiewski suggested that additional monitoring at SLAPS might be useful. Mr. Adler said that would be a logical first step to better define current conditions and to establish base data for use in monitoring future conditions.

Mr. Adler then explained the allocation of FY 96 funds to date. He said the cost of efforts to explore the use of local landfills for disposal of minimally contaminated material is about \$27,000. Efforts to explore a new in-state disposal facility have cost about \$28,000. Soil treatment testing is expected to cost about \$89,000 of the \$250,000 allocated for that purpose.

Ms. Price asked how much remains available from this year's funding and what happened to the \$4 million set aside for the ballfields.

Mr. Adler said about \$2.6 million currently is not committed to any project and is available for FY 96 activities. He added that the full \$4 million intended for the ballfields is not available because of cost overruns last year (FY 95) at Mallinckrodt. In addition there have been other costs, such as state

oversight grants, that have been funded out of the site's FY 96 budget.

Ms. Price asked how quickly a cost estimate for the Riverfront Trail project could be developed and provided to the Task Force.

Mr. Adler said that project could cost anywhere from \$50,000 to \$20 million, depending on the remediation plan. He said an estimate based on a remediation plan that would not require excavation of all the contaminated material might fall within the \$2.6 million available. But he said the trail cleanup probably will require use of some FY '97 funds as well, because characterization data indicate the presence of about 4,000 cubic yards of contaminated material.

*Alternative Sites
Working Group
Report*

Mr. Dwyer said the Alternative Sites Working Group has not yet developed a formal report and recommendation. However, he advised that the working group had met and considered presentations by representatives of Dawn Mining Co. and Envirocare, and that Dawn Mining was determined to be in the same category of suitability as Envirocare. When the working group compared the two sites, it concluded there was nothing significant to suggest that either site was more suitable than the other, even though there are distinctions between the two, he said.

Old Business

Mr. Adler reported that the technical memorandum summarizing efforts to identify local sanitary waste landfills for potential disposal of minimally contaminated 11(e)2 material had been forwarded to the state (MDNR) for its review.

New Business

Ms. Drey asked for a written report on results of the soil washing tests conducted on St. Louis soils by Clemson Technical Center. Mr. Miller produced a copy of a draft report, which he said would be available for inspection at the DOE Public Information Center.

Sally Price noted that MDNR had distributed to the Task Force the revised draft of the site history portion of the final report. She thanked MDNR for its hard work and asked if there were any need to take action on that portion of the report today.

Mr. Dwyer encouraged all Task Force participants to review the revised draft carefully and to offer comments. He then said his notion is to include the history section as an appendix to the Task Force report because it is such a lengthy document. He said he had originally presumed a site history of six to 10 pages.

Ms. Steward said MDNR intended that the site history be part of the body of the report, and not simply an appendix, because the history of the site strongly influences remedy selection.

Ms. Price agreed.

Mr. Larson requested that DOE put together a summary of the Dawn Mining Co. and Envirocare disposal facilities, including information on geological characteristics of each site, etc. He asked that footnotes citing references be included.

Mr. Adler agreed to provide the requested information.

The meeting adjourned 10:03 a.m.

The next meeting of the St. Louis Site Remediation Task Force is scheduled for June 18, 1996.

Approved June 18, 1996

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Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for the St. Louis Site, Missouri



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