

St. Louis Site Remediation Task Force
Special Meeting

(Remediation Options Working Group)

July 10, 1996 Meeting

Hazelwood Civic Center East
Hazelwood, Missouri

APPROVED

Participants Attending

Dave Adler, DOE
Tom Binz, Laclede Gas
Kay Drey
Doug Eller, Riverfront Trail
Jack Fraenhoffer, Mallinckrodt Chemical
Peggy Hermes, Coalition for the Environment
Sally Price, Chair
Conn Roden, St. Louis County
Mitch Scherzinger, MDNR
Elsa Steward, MDNR

Support

Jim Dwyer, Facilitator
Sarah Snyder, FUSRAP

<u>Agenda Item</u>	<u>Minutes</u>	<u>Determination</u>
<i>Call to Order</i>	Jim Dwyer called the meeting to order at 5:18 p.m.	
<i>Approval of Minutes</i>	Mr. Dwyer asked if there were proposed revisions to the draft summary notes of the June 25, 1996 meeting. The summary notes of the June 25, 1996 meeting were amended and approved.	The summary notes of the June 25, 1996 Remediation Options Working Group meeting were approved as amended.
<i>Identification of Information Needs</i>	Mr. Dwyer then proposed that the group begin the meeting by identifying outstanding information requirements, if any, that must be satisfied in order to develop an initial draft of the Task Force report to DOE. He invited participants to offer ideas throughout the meeting.	

Sally Price inquired about the status of the Technologies Working Group report and recommendation, and indicated that that information is very important.

Mr. Dwyer reported that Jim Grant had begun drafting a report more than a month ago but that there are unresolved issues concerning the cost effectiveness of ex-situ vitrification. He said the Technologies Working Group is scheduled to meet Tuesday, July 16, 1996 to discuss these issues and to develop its report.

*Discussion of Cost
Estimate and Risk
Assessment
Information*

Mr. Dwyer then asked participants to present their views on the significance of cost estimates and risk assessment as they relate to each of the remediation options identified by the Task Force.

Elsa Steward said that MDNR does not object to a discussion of relative costs, but there is a protective threshold below which it is unacceptable to allow cost to be a determining factor. Dave Adler agreed that any remediation plan must result in protective conditions.

Jack Fraunhoffer illustrated his thoughts about cost and risk considerations. He said that, based on SAIC's cost/risk data, significant risk reduction is achieved with Option III, with no additional risk reduction with Option IV, but with significantly greater cost.

He also noted that taxpayers will ultimately pay for cleanup of the St. Louis Site. He said that when he considers the limited amount of funding available, it is not acceptable to him to pay more than is required to achieve the optimal reduction in risk. Mr. Fraunhoffer said, for that reason, he is generally comfortable with the Option III cleanup levels.

He said he can accept the risk assessments developed by SAIC because they are the experts who deal regularly with risk calculations. But Mr. Fraunhoffer said he doesn't have sufficient information about groundwater risk. He said the Task Force

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has some of that information available to it from the Coldwater Creek Panel report, which concluded that groundwater is moving slowly at SLAPS. He suggested that it might be more effective to wait for the development of a new technology than to excavate the site and ship the contaminated materials to a remote disposal site.

Mr. Fraunhoffer added that there always will be a governmental agency that is responsible for the site, even if it is not DOE. As long as there is an agreement with the government that the liability is theirs, he said he doesn't think the Task Force needs to spend upwards of \$1 billion to remediate the St. Louis Site, based on the SAIC cost/risk data. Mr. Fraunhoffer said these were his personal views.

Peggy Hermes said she thought waiting for future technologies would be irresponsible. She said she didn't agree with Mr. Fraunhoffer's analysis about costs and risks and said the Missouri Coalition for the Environment's position is that cost should not determine the level of cleanup.

Elsa Steward noted that the cost of an immediate remedy is not the only cost consideration. She said that in the event that remediation doesn't work, there could be additional costs in the future. She said that sometimes it is necessary to spend more in the present to save money in the future.

Ms. Price said she thought that everyone fundamentally agrees that the groundwater must be sufficiently protected. So the Task Force first has to agree on the threshold for cleanup to ensure protection of the groundwater. She said she didn't know how that could be done at SLAPS without excavating the waste.

Dave Adler said the groundwater issue is complicated, and said he hoped the Task Force won't forget the information and conclusions presented in the Coldwater Creek Panel's report.

Ms. Price said the Task Force report needs

to respond to the panel's report. She said that if the Task Force recommends excavating SLAPS, it will need to explain where and why it disagrees with the Coldwater Creek Panel.

Mr. Adler said that was his point. He said the Task Force can discount that expert panel's conclusions, but he said he thinks it would be strategically unwise to recommend digging up SLAPS because of concern about groundwater quality and not mention the panel's report.

Mitch Scherzinger noted that the Coldwater Creek Panel indicated in its report that there are gaps in the data utilized in the groundwater model. This in turn brings the validity of the assumptions made into question.

Ms. Price cited the Coldwater Creek Panel report's conclusions, several of which contained qualifying statements about gaps in the data. "The panel concluded that the deep groundwater system has not yet been sufficiently characterized, and that both the model and the conclusions drawn from the model will require verification as additional data become available." She said the panel concluded that additional data will be required to develop a more complete hydrogeological assessment of the deep groundwater system and a more comprehensive analysis of contaminant sources.

Mr. Adler said there is always uncertainty at Superfund sites, so one can't just say that because there is uncertainty, the site should be dug up.

Mr. Frauenhoffer said his first concern is risk. He said it is not possible to achieve zero risk, so the next best thing is to evaluate the improvements in the reduction of risk. If the lowest level of risk reduction is achieved by Option III, what advantage is gained by doing more work? He said that when the Task Force tries to approach zero risk, the cost will go way up.

Mr. Scherzinger said that if the Task Force cuts corners today, it may have another cleanup in the future. He said that as long as there is excavation, it makes sense to go ahead and do complete cleanup. He then asked for the definition of a hot spot.

Mr. Adler said that hot spot reduction would be expressed in terms of performance standards, so the question would be what design (or cleanup plan) meets the desired performance standards.

Kay Drey said that MDNR has always maintained that the waste cannot stay in the groundwater. If the waste is not exhumed, there would have to be a liner or some other means of protection under it.

Ms. Steward confirmed that that is David Shorr's (director, MDNR) position.

Ms. Drey noted that the risk assessment information speaks only to cancer risks, and does not address other illnesses or disorders that may be caused by exposure to radioactive contamination.

*Develop/Refine
Remediation
Alternatives for
Component Sites*

Mr. Fraenhoffer then suggested that each participant express his or her preference for remediation options for each of the component sites. He recommended that the working group identify areas of agreement first, and then address areas of disagreement.

Ms. Hermes suggested first discussing the component sites that were not addressed at the June 25, 1996 meeting. The working group agreed that Coldwater Creek had not been fully discussed at that meeting.

Mr. Adler asked those present to consider the environmental impact of complete cleanup to Option IV standards on the creek bed and natural habitat of the creek. He said that the last three miles of the creek is heavily wooded and that cleaning to the 5/15 picocuries per gram standard would result in significant damage to the creek environment, including the destruction of many trees.

He said the stretch of the creek closer to the airport is in an industrial area and has been heavily impacted by culverts and industrial activities. He said that, as a creek fan, he would vote to spend money on severely degraded areas at the upper end of the creek and let the more natural downstream areas take care of themselves.

Ms. Hermes said the coalition would have to disagree with that proposal.

Ms. Price said the lower end of the creek is beautiful and said she would hate to see it bulldozed. However, the upper portions of the creek that are in industrial areas could probably be more thoroughly cleaned up without negative consequences. She said she would therefore have to back away from total cleanup of the entire length of Coldwater Creek to Option IV standards. She said she thinks the people who live at the lower end of the creek would be greatly distressed if they knew DOE would have to bulldoze the trees in the area in order to get to the creek.

Mr. Fraenhoffer asked why the Task Force would want to damage a relatively pristine area.

Mr. Scherzinger said he thought it was too late to start breaking the creek into segments with different cleanup standards.

The working group then agreed to go around the table and to provide each participant an opportunity to identify his or her cleanup preferences for each component of the site.

Peggy Hermes, speaking for the Missouri Coalition for the Environment, said the coalition wants an Option IV cleanup for all the component sites except Mallinckrodt (SLDS) and West Lake Landfill. The coalition wants an Option III cleanup for Mallinckrodt and West Lake Landfill. [NOTE: Ms. Hermes said Roger Pryor would call with the coalition's position regarding the Riverfront Trail and Coldwater Creek. Mr. Pryor called the next day and advised that the coalition prefers Option III cleanup for the Riverfront

Elsa Steward and Mitch Scherzinger spoke for MDNR and reported that due to the acceptance of Option III by Mallinckrodt and the state's concurrence with DOE's future use scenario for both Mallinckrodt and the St. Louis levee area, MDNR prefers Option III for Mallinckrodt and the Riverfront Trail and Option IV for all other component sites, including the entire length of Coldwater Creek. MDNR would not consider an Option III for the last three miles of Coldwater Creek without an appropriate indication from an environmental risk assessment.

Tom Binz said the gas company has determined a preference only for the component site that most affects its operations, the north county haul routes. He advised that Laclede Gas prefers an Option IV cleanup for this component of the site.

Conn Roden, who attended on behalf of St. Louis County, said he would have to confer with the county administration before stating official preferences. However, he said that from his personal perspective he is concerned about many of the comments he has heard which recommended a lot of "Option IV for cleanup" without adequate information concerning the technology, risks and associated costs. He said he is probably more in tune with some of Mr. Fraenhoffer's previous comments which indicated careful consideration of significant risk reduction and the costs incurred from one option to the next. He further stated he believes that it would be unrealistic to submit a report to the Department of Energy which did not address those concerns, nor the requirements of CERCLA (Superfund) and other laws governing cleanups of hazardous waste sites. To do so would be in conflict with the philosophy and intent of the statutes and regulations.

Sally Price said she doesn't know enough about conditions at West Lake Landfill, so she does not feel she can recommend a cleanup option. She said she can accept

Option III for Mallinckrodt (SLDS) because it is in an industrial area, and for the Riverfront Trail. She said she wants an Option IV cleanup for the other components of the downtown site (SLDS) because the land is accessible to the public. She said HISS and the other north county component sites may some day be needed for airport expansion or other development, and the land should be free of radiological restrictions. She said she was open to the concept of an Option III cleanup at SLAPS, provided it can be shown that the groundwater is safe, because she doesn't foresee any residential development happening at SLAPS. She would like an Option IV cleanup for Coldwater Creek near SLAPS, with hotspot removal (Option III) for the lower end of the creek in order to minimize the impacts of excavation to the existing natural conditions of the creek.

Jack Frauenhoffer said he prefers Option III for Mallinckrodt (SLDS) and the Riverfront Trail. He said he prefers Option IV for the downtown vicinity properties because they are private properties with no restrictions on public access. He said he thinks West Lake Landfill falls somewhere between Option II and Option III. However, he said that the established regulatory process for West Lake Landfill is going to take its course and will determine the final remediation plan. He said he prefers Option III for SLAPS and the ballfields based on future land use. He said the Coldwater Creek Panel report stated it was comfortable developing projections with data available to it, although it acknowledged that there were data gaps. He said he prefers Option III for Futura and HISS because they are located in an industrial area, although he said he is not sure how to provide the necessary land use controls for the future. He prefers Option IV for the portion of Coldwater Creek near SLAPS and Option III for the pristine areas of the creek closer to the river.

Doug Eller, speaking on behalf of the Riverfront Trail, said he prefers an Option III cleanup for the trail. He said he didn't know enough about the other sites to express any preferences.

Kay Drey said she would reluctantly go along with Option III for Mallinckrodt (SLDS), even though it is in the floodplain. She said she would reluctantly go along with Option III for the Riverfront Trail as well. With respect to Coldwater Creek, she said she concurs with Mr. Frauenhoffer and Ms. Price, although very reluctantly, and will support an Option IV cleanup for the stretch of creek near SLAPS and an Option III cleanup for the natural segments of the creek. She said she would like signs to be installed warning of the presence of contamination along the creek. She said she prefers Option IV for all the other component sites.

The meeting adjourned at 8:50 p.m.

Approved July 18, 1996

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