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October 18, 1994

U.S. Department of Energy
Oak Ridge Field Office
P.O. Box 2001
Oak Ridge, TN 37831-8758

Attention: Mr. David G. Adler
Site Manager - Missouri Sites

Subject: Contract DE-AC05-91OR21950
ST. LOUIS - COMMENT/RESPONSE DOCUMENT FOR THE HISS EE/CA-EA

Dear Mr. Adler:

Enclosed is one copy of the Comment-Response Document for the HISS EE/CA-EA. All comments submitted during the 30 day comment period have been addressed and further emphasis was placed on comments and responses related to the upcoming residential property remediation. As per your direction, this document will be submitted as part of the Administrative Record. All of the letters submitted during the comment period have previously been added to the Administrative Record.

If you have questions, please feel free to call me at 481-2156.

Sincerely,

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION

David S. Miller
Senior Environmental Scientist
FUSRAP

DSM:TMP:sh

Enclosure

cc: L. Price, FSRD (w/o)
B. Seay, FSRD (w/o)
G. Palau, BNI (w/e)
J. Williams, BNI (w/e)
C. Jenkins, BNI (w/e)
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The Comment/Response Document for the
Engineering Evaluation/Cost Analysis-Environmental Assessment for the Proposed
Decontamination of Properties in the Vicinity of the Hazelwood Interim Storage Site,
Hazelwood, Missouri (EE/CA-EA (March 1992)

October 17, 1992

1. INTRODUCTION

On April 7, 1992 the U.S. Department of Energy (DOE) issued the *Engineering Evaluation/Cost Analysis-Environmental Assessment for the Proposed Decontamination of Properties in the Vicinity of the Hazelwood Interim Storage Site, Hazelwood, Missouri* (EE/CA-EA (March, 1992) to support interim clean-up measures in the Hazelwood and Berkeley, Missouri area. A number of comments were submitted to DOE over the subsequent 30-day comment period on the EE/CA-EA. This responsiveness summary addresses the comments received during that period. In addition to general responses to comments this document includes specific responses related to the residential property remedial action which was initiated by the Action Memorandum, HISS - Action Memorandum for Residential Property Cleanups dated October 12, 1994. The Action Memorandum initiates the remediation of six of sixty-four properties identified in the EE/CA-EA as targets for remedial action. The remediation of the six residential properties was expedited because DOE places a priority on residential cleanups and so that the residential properties owners could be relieved of their hardships while the newly formed St. Louis Site Remediation Task Force works toward a proposal for remediation of the entire St. Louis site.

The cleanups of the residential properties have been initiated as interim actions while the process of selecting a final remedy takes place. A major change for the planned action is the decision to dispose of the contaminated soils at a commercial disposal facility. This is in contrast to the temporary storage recommended by the EE/CA-EA. All comments received on the EE/CA-EA have been placed in the Administrative Record file for the St. Louis site.

2. SCOPE AND ORGANIZATION OF THE RESPONSIVENESS SUMMARY.

Seventeen letters of comment were received during the comment period from concerned citizens, property owners, and local, state, and federal officials. Table 1 provides an alphabetical listing of the individuals submitting comments.

Many of the commenters expressed similar concerns. Within the seventeen letters, 75 separate comments and questions could be discerned. To prevent repetition and yet provide responses to all comments and questions, the comments were grouped under ten key subject areas. The key subject areas are listed below in relative order, from most to least number of comments received:

- HISS interim storage - expansion, design, and environmental impacts (35)
- Clean-up priorities and related land development issues(10)
- Potential for recontamination from clean-up actions (8)
- Independent Oversight - establishment of an independent commission (5)
- Volume and extent of contamination (5)
- Regulator participation (4)
- Clean-up guidelines and background values(3)
- Remedial action monitoring and maintenance concerns (3)
- Description of site surficial geology (1)
- Mallinckrodt responsibility (1)

3.0 COMMENTS AND RESPONSES

3.1 Comments on the Interim Storage of Contaminated Soils at the HISS

Many comments objecting to the additional interim storage of contaminated soils at the HISS were received. The reasons for objections included concern about local environmental impacts and the idea that additional volumes would increase the likelihood of the HISS becoming a permanent storage site. Several individuals recommended the Callaway nuclear power plant as a disposal site. Other concerns focused on the design features of an additional storage pile.

DOE RESPONSE: To address public concern over the potential for expansion of the Hazelwood Interim Storage Site, contaminated soil resulting from the residential property removal actions will be sent to the Envirocare facility in Clive, Utah, for permanent disposal. This disposal option became available when the Envirocare facility received the permits needed to accept DOE's 11e(2) byproduct material. Disposal of material from future site-wide cleanup activities will be decided at a later date.

3.2 Prioritization of Remedial Actions and related Land Development Issues

Comments were made and questions raised as to how the remedial activities were prioritized. Other comments related to the type of land development activities that might cause the spread of contamination or other problems for DOE. It was asked if DOE had the authority to prohibit development on contaminated areas. Concerns were also raised as to the potential impact that the interim remedial activity might have on the long-term remediation of the site.

DOE RESPONSE: Consensus was sought and obtained by DOE from the community and the regulatory agencies for proceeding with the residential property remediation. This interim action was proposed during the August 8, 1994 Stakeholders' Summit meeting by Assistant Secretary Thomas Grumbly after correspondence with the Environmental Protection Agency (EPA) and the Missouri Department of Natural Resources (MDNR). Since then, the consensus for this action has been confirmed during the meetings of the St. Louis Site Remediation Task Force - an independent commission established as a result of the Stakeholders' Summit.

The text of the EE/CA-EA currently states that "Site conditions meet the criteria listed in Section 300.415(b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) for categorization of specific cleanup efforts as removal actions because there is 'potential exposure to nearby populations, animals, or the food chain from hazardous substances or pollutants of contaminants.'" The conditions present at the SLAPS and HISS vicinity properties warrant selective interim removal actions, as necessary, to prevent the inadvertent spread of contamination that could result from various non-DOE-initiated land development activities. DOE does not have the authority to prohibit the development of contaminated areas.

Approximately 2,000 cubic yards of soil will be removed during the residential property clean-up. This represents less than 0.25 percent of the total contaminated soil volume at the St. Louis site and will have no significant effect on the choice of reasonable alternatives or the ultimate decision of the FS process.

3.3 The Potential for Recontamination Resulting from Remedial Activities

As part of their objections to the expansion of the HISS, several commenters noted that the transport of material to interim storage had been responsible for spreading contamination along the haul routes. Concerns were expressed about the potential for additional contamination occurring as the result of the proposed remedial activities.

DOE RESPONSE: Instead of hauling soil in open dump trucks, the residential property remediations will use intermodal containers which, after being filled at the excavation site, will be sealed and locked prior to transport. They will remain sealed and locked until they reach the commercial disposal facility, thereby eliminating the potential for the spread of contamination by spillage. The containers will be lined with plastic sheeting that is draped over the edge of the container and into the excavation during loading.

3.4 Independent Oversight of St. Louis Site Remedial Activities

Several commenters expressed the desire to see an independent group established to oversee the remedial activities at the St. Louis site. It was also suggested that an independent advisor be provided to evaluate the plans and progress of the remediation.

DOE RESPONSE: The St. Louis County and City Councils established a remediation task force in September 1994 for the purpose of recommending a remedy to DOE for the clean-up of the entire St. Louis site and monitoring cleanup activities. Membership was unrestricted and open to all concerned and, in fact, includes many of those recommended by the commentator. DOE has provided a grant to support the hiring of an independent consultant to assist in the evaluation of the remedial process at the St. Louis site.

3.5 Volume and Extent of Contamination

Concerns were expressed as to how well the contamination boundaries have been defined. It was noted that estimates of the total contamination volumes prior to remediation are often low.

DOE RESPONSE: The St. Louis site has been extensively sampled and characterized to define the boundaries of contamination. The results of these efforts are documented in the Remedial Investigation (RI) and the accompanying addendum (RI-Addendum). In addition, as remediation takes place, sampling and analysis will be performed both by the remedial team and by an independent verification contractor to assure that all contaminated materials are removed.

3.6 Regulator Participation

Comments were made by the regulatory agencies that, in addition to the formal commitments between the DOE and the EPA, both the state and federal regulators should be kept abreast of the progress on individual remedial efforts and the comprehensive plan for remediation at the St. Louis site.

DOE RESPONSE: Both the EPA and MDNR have been closely involved in providing suggestions as to remedial priorities in St. Louis. In addition, they have been kept abreast of the DOE's efforts to implement innovative technology and have been in attendance at all of the public forums.

3.8 Cleanup Guidelines and Background Values

Questions were raised as to the cleanup levels to be used for remedial action and assessing the level of their protectiveness. It was recognized that the residential property cleanups will likely exceed (be cleaner than) the target cleanup levels. It was suggested that the background levels of the important radioisotopes be stated.

DOE RESPONSE: The clean-up guidelines stated in the *Engineering Evaluation/Cost Analysis for the Proposed Decontamination of Properties in the Vicinity of the Hazelwood Interim Storage Site, Hazelwood, Missouri* will be used for the residential property clean-ups. They are 5 pCi/g for Radium-226 and Thorium-230 and -232 in the top six inches of soil, and 15 pCi/g for the same isotopes deeper than six inches. The clean-up criterion for Uranium-238 will be 50 pCi/g throughout. DOE agrees that it is likely that lower levels will be reached during the actual cleanup. Risk calculations will be performed based on actual values obtained from post-remedial sampling.

The background values for the radioisotopes determined from sampling at the St. Louis site are 1.1 picocurie per gram (pCi/g) for Uranium-238, 0.9 pCi/g for Radium-226, 1.3 pCi/g for Thorium-230, and 1.0 pCi/g for Thorium-232.

3.8 Remedial Action Monitoring and Utility Concerns

Concerns were expressed regarding the nature and extent of monitoring activities and the process for avoiding damage to utilities.

DOE RESPONSE: During removal activities along the vicinity properties, continuous ambient air monitoring will be performed in the vicinity of the work area. If any problems are noted from this activity, work will be shut down and additional controls will be put in place. In addition, hand held alpha and beta/gamma scanning instruments shall be used to direct the excavation activities, and engineering controls will be in place to prevent the spread of contamination. Following the removal of contaminated soils along the vicinity properties, no future monitoring and maintenance activities will be required. The current environmental monitoring program at the Hazelwood Interim Storage Site will continue until the final remedial alternative has been implemented.

All of the appropriate utility agencies will be notified of remedial plans and schedules and will provide the locations of their utilities. Provisions have been made to have an inspector present to avoid remedial interference with gas lines.

3.9 Description of Site Surficial Geology

It was noted that the description of the surface geology was incorrect.

DOE RESPONSE: The text has been corrected.

3.10 Mallinckrodt Responsibility

A question was asked regarding the responsibility of the Mallinckrodt Company in this remediation.

DOE RESPONSE: Mallinckrodt Inc. has no responsibility associated with the radioactive contamination of this remedial effort. The contamination addressed in the HISS EE/CA-EA resulted from the activities of other contractors who had purchased the materials from the federal government. As a result of congressional legislation, the Department of Energy has assumed responsibility for the remediation of radioactive contamination originating from MED and AEC activities at the Mallinckrodt plant.

Table 1: List of Commenters

Phil Baker
Facility Manager, Morton Salt Company

Donald W. Bennett
Director of Airports

Ron Black
Engineer, Union Electric

Lee Brotherton
Director, St. Louis County
Transportation and Environmental Policy

Jeffrey Davidson
Attorney

Sandy Delcoure (2 letters)

Kay Drey

David W. Farquharson
Mayor, City of Hazelwood

Virginia Harris

Yvonne Logan
Director, World Community Center

Nancy Lubiewski

G. Tracy Mehan
Director, MDNR

William Miller
Mayor, City of Berkeley

Mollie C. Rickey
Mayor Pro Tempore
Councilwoman - Ward 5

John R. Shear
Chairman, St. Louis County Council
Councilman, 1st District

Eldora Spiegelberg
President, St. Louis Branch of the
Women's International League for Peace and Freedom

Administrative Record for the Formerly Utilized Sites Remedial Action Program (FUSRAP) North St. Louis County Sites

St. Louis County, Missouri



**US Army Corps
of Engineers**

St. Louis District[®]

Volume 8 -
Public Affairs/Community Relations
8.12 – Written Response to Public
Comments/Questions
8.13 – Public Notices

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Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for the St. Louis Site, Missouri



U.S. Department of Energy