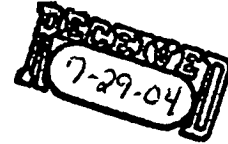


STATE OF MISSOURI Bob Holden, Governor • Stephen M. Mahfood, Director
DEPARTMENT OF NATURAL RESOURCES

www.dnr.state.mo.us

July 29, 2004



Ms. Sharon Cotner, Project Manager
Formerly Utilized Sites Remedial Action Project
Department of the Army
St. Louis District, Corps of Engineers
9170 Latty Avenue
Berkeley, MO 63134

RE: INITIAL FIVE-YEAR REVIEW REPORT, for the FORMERLY UTILIZED SITES
REMEDIAL ACTION PROGRAM (FUSRAP) ST. LOUIS FUSRAP SITES - Public Review
Draft

Dear Ms. Cotner:

The Missouri Department of Natural Resources has completed its review of the above referenced document. We commend the U.S. Army Corps of Engineers (USACE) on the quality of this document, and believe it describes the activities of the last 5 years in a manner that is easily understandable. In addition, we believe your staff did an excellent job of trying to follow available guidance, obtain public opinion, and involve regulatory agencies with the preparation and review of this document.

Please note that the department currently continues to disagree with two statements made in the Five-Year Review document concerning groundwater. The first, on page VI-17, first paragraph, is a statement regarding whether contamination could migrate to lower aquifers. And, secondly, on page VI-17, the last sentence of the third paragraph, is a statement regarding an increasing arsenic trend in one well at the SLAPS, and how it cannot be related to FUSRAP-related activities at the SLAPS.

The USACE should, at a minimum, note that: 1) radionuclides and arsenic are detected in the surrogate intervals for monitoring the lower aquifer; 2) and that previous USACE documents had speculated whether these detects were indications that migration was occurring. Arsenic levels continue to exceed the MCLs and radionuclides are at levels exceeding previous USACE developed values associated with ambient conditions. Further details regarding the USACE's

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CF: Mattingly
Allen
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Ms. Sharon Cotner
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change in their position on each of these issues, or if the arsenic and radionuclides present are naturally occurring or from other sources, should be provided.

We again thank you for giving us the opportunity to review and comment on this document. If you have any questions regarding any issue we have raised, or need further clarification please call me at (314) 877-3251. Address any written communication and responses to me at 917 N. Hwy 67, Suite 104, Florissant, MO 63031.

Sincerely,

HAZARDOUS WASTE PROGRAM

Erin Milotay on behalf of:

Jo Anne Wade, Environmental Specialist III
DOE Unit, Federal Facilities Section

JW:dd

c: Mr. Jim Grant, Mallinckrodt Chemical
Mr. Daniel Wall, U.S. Environmental Protection Agency - Region VII

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Author/Originator

Jo Anne Wade

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USDOE

Date

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