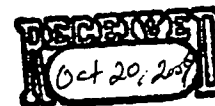




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

October 15, 2004



Ms. Sharon Cotner
FUSRAP Manager
Department of the Army
St. Louis District, Corps of Engineers
8945 Latty Avenue
Berkeley, Missouri 63134

Re: Draft Final Five-Year Review Report (August 23, 2004)

Dear Ms. Cotner:

The Environmental Protection Agency (EPA) has reviewed the Draft Final Five-Year Review Report. We agree with the findings of the report that the selected response actions are protective and will be protective once fully implemented. EPA agrees with the protectiveness statements as presented on page X-1. Generally, EPA's comments on the initial draft of the report have been adequately addressed in this version. However, as a result of our final review we found several statements that could use clarification. We do not think any further revision to the document is necessary, but we would like to go on record with the following:

The report contains several general statements (e.g., pg. VI-4) to the effect that all removal or remedial actions completed to date have allowed for unlimited use and unrestricted exposure. These statements could be misleading since certain areas will not meet this standard. The remedy for SLDS anticipates use restriction for inaccessible soils, i.e., some deep soils and some soils under permanent structures. The specifics of the remedy were deferred to a subsequent decision that is still forthcoming. With respect to the North County sites, final remedial goals and corresponding cleanup criteria have not yet been selected.

As a corollary to the first comment, in describing what has been cleaned up and where, the USACE presents the soil criteria as consistent with unlimited use and unrestricted exposure without appropriate qualifications. In the case of SLDS, the soil cleanup criteria for radium and thorium in accessible areas were established in the SLDS ROD consistent with EPA guidance regarding the circumstances under which the soil cleanup criteria in 40 CFR Part 192 should be considered an ARAR. The uranium standard was shown to meet a risk-based test. Therefore, in the case of accessible areas at the SLDS and the SLDS VPs it may be appropriate to discuss these soil criteria prospectively as resulting in a cleanup consistent with unlimited use and unrestricted exposure. This would not be true of the areas where the deep soil criteria are applied.

C. K. H. Hingly (original)

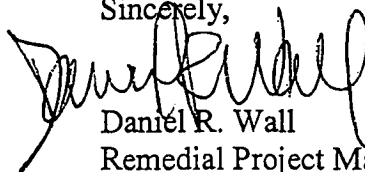


Similar determinations have not yet been made with respect to the North County site cleanup actions.

The USACE makes the statement that for inaccessible soils at SLDS, access control and an excavation permit process are sufficient to prevent or minimize exposure. EPA agrees that this provides adequate interim control on inaccessible soils; however, the inaccessible soils ROD, which will establish the appropriate long-term controls, will need to proceed in a timely manner.

Enclosed is a copy of your transmittal letter signed by our Division Director to indicate EPA's acceptance of the Five-Year Review Report. Please call if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel R. Wall", is written over the typed name.

Daniel R. Wall
Remedial Project Manager
Superfund Division

Enclosure

cc: Robert Geller, MDNR



DEPARTMENT OF THE ARMY
ST. LOUIS DISTRICT, CORPS OF ENGINEERS
8945 LATTY AVENUE
BERKELEY, MISSOURI 63134

REPLY TO
ATTENTION OF:

September 9, 2004

Formerly Utilized Sites Remedial Action Program

Subject: Draft Final Five-Year Review Report: Initial Report for FUSRAP St. Louis Sites dated August 23, 2004

Mr. Dan Wall
U.S. Environmental Protection Agency
Region VII, Superfund Branch
901 North Fifth Street
Kansas City, KS 66101-2907

Dear Mr. Wall:

In accordance with Section X, paragraph B.2 of the Federal Facility Agreement please find enclosed a copy of the draft Final Five-Year Review Report: Initial Report for FUSRAP St. Louis Sites dated August 23, 2004 for your review. The Federal Facility Agreement allows a thirty (30) day period for review of primary documents however should your review allow acceptance prior to the expiration of this 30-day period please indicate such by signing and dating the enclosed copy of this letter in the place indicated and returning it to the above address.

The 30-day Public Review period for the draft report ended on July 28, 2004. The only comments received on the Public Review version of the report were received from the Missouri Department of Natural Resources (MDNR) via letter dated July 29, 2004. MDNR restated two comments, made on earlier versions of the report, regarding ground water at the St. Louis Airport Site. A copy of MDNR's July 29, 2004 letter and the United States Army Corps of Engineer's letter reply dated September 9, 2004 are also enclosed for your review.

If you have any concerns or questions regarding this matter, please contact Gerald Allen at (314) 263-1543.

Sincerely,

Sharon R. Cotner
FUSRAP Program Manager

Enclosures

CF: Mr. Robert Geller, Missouri Department of Natural Resources
Ms. Jo Anne Wade, Missouri Dept. of Natural Resources

Accepted By: 
United States Environmental Protection Agency

Date: 9/28/04

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Further Info?
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St. Louis Sites

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EPA's comments on the Draft Final Five-Year Review Report dated August 23, 2004

Author/Originator

Dan Wall

Company

USEPA

Date

10/15/2004

Recipient(s)

Sharon Cotner; Robert G

Company (-ies)

FUSRAP; MDNR

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