



Department of Energy

Oak Ridge Operations Office
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97-195

SL-1197

Mr. Mitch Scherzinger
Missouri Department of Natural Resources
Division of Environmental Quality
Jefferson City, Missouri 65102-0176

Subject - MDNR Comments on the document entitled "Quarterly Progress Report for the Period January through March 1997 for the St. Louis Site"

Dear Mr. Scherzinger:

Your comments on the subject document have been reviewed. Comment resolutions are as follows:

Comment 1 - Bullet 5, Stating that nine (9) buildings at SLDS slated for demolition within the federal fiscal year 1997 and the crushate will be used as backfill material during the Plant 2 remediation.

General comment - "...in Mr. David Shorr's letter to Mr. Dave Adler, dated April 28, 1997, Mr. Shorr identified nine (9) conditions which must be met prior to MDNR concurrence of on-site disposal of the 50's Series building's rubblelized masonry debris. The same nine (9) criteria will also apply to the subject buildings".

Response - DOE acknowledges that the criteria will be the same.

Comment 2 - Bullet 6, Second paragraph. Comment - "From the information pertaining to the above mentioned sample bottles provided to this office to date, it has been determined by the HWP that this site potentially meets the definition of a RCRA - Solid Waste Management Unit. The FFS is requesting that an Assessment Work Plan be provided to this office for review and comments. Said work plan should include a discussion of past waste management practices as is necessary for the determination of whether a release of hazardous waste has or is occurring within or in the vicinity of Building 116".

Response - The room in which the vials are located has been surveyed and inspected. There is no evidence that a release of hazardous waste has occurred or is currently occurring in Building 116. A subcontract is in place for a licensed Hazardous Materials handling and disposal company to mobilize to Building 116, lab pack the vials of chemicals and/or radioactive materials, and dispose of at licensed disposal facilities. A work plan for this activity has been prepared and a readiness briefing is scheduled.

Comment 3 - Bullet 7. Comment - "The MDNR has not adopted DOE guidelines pertaining to groundwater. Therefore, this office requests that both chemical and radiological analytical results be provided to the MDNR Division of Geology and Land Survey for review and comment".

Response - The chemical and analytical results was provided via fax as requested. A formal report under cover letter will be submitted.

Comment 4 - Community Outreach. Comment - "The FFS requests that the DOE keep this office apprised of any and all upcoming community outreach activities including activities pertaining to the development of a Site Specific Advisory Board".

Response - Noted. This information will be provided in the weekly status report.

Comment 5 - 9150 Latty Avenue. Comment - "During the time period covered by this report the FFS expressed concern to the DOE related to the disturbance of DOE waste by Allied Technology Group, Inc. at the property leased by Stone Container. No mention was made of these concerns in this report. One issue which continues to remain unresolved is the fact that the pile of contaminated soils and debris has not yet been adequately covered or protected from off-site migration. What is the status of this issue?"

Response - The purpose of the quarterly status report is to delineate the actual work that was performed on the St. Louis sites and give summaries of sampling campaigns. This report has not been the vehicle to define or resolve issues. The status of the Stone Container leased property is that the property owner and Allied Technology Group (ATG) is currently in a contract dispute that is being cleared up at this time. Once the dispute is resolved ATG will cover and/or contain the pile on the property.

Comment 6 - Special Groundwater Study. Comment - "This section of the report lists analytical results for total metals and total dissolved radionuclides. Were other parameters such as pH, conductivity and total dissolved solids analyzed, and if so, what are the results?"

Response - Our standard operating procedure for sampling groundwater includes recording the following field parameters while purging the well: temperature, specific conductance, pH, Eh, dissolved oxygen, and turbidity. These parameters are not analyzed in the lab however, the results are delineated in a sample logbook for the site and is kept on file in the BNI Oak Ridge office. For this particular study, the samples were also analyzed for chlorides and total dissolved solids. The results are:


Well I.D.	Cl (mg/l)	TDS (mg/l)
B53W09D	2.0	450
B53W11D	8.8	428

Comment 7 - General Comment - "For all future groundwater analysis please include strontium and lithium to the total metals analyte list".

Response - For all future groundwater analysis in which a total metals analysis is requested, strontium and lithium will be added to the list.

If you have any questions, please contact me at (314) 524-4083 or Mr. Wayne Johnson at (423) 576-5165.

Sincerely,


E. R. Valdez
Deputy St. Louis Site Manager

cc: Wayne Johnson
Ken Albin
Billy Johnson

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