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



REPLY TO
ATTENTION OF:

February 7, 2002

Formerly Utilized Sites Remedial Action Program

SUBJECT: Removal of Outfall 003 and Reduced Sampling on Outfall 002 from the Applicable or Relevant and Appropriate Requirements (ARARs) for Discharges to Waters of the State by the United States Army Corps of Engineers (USACE) at the St. Louis Airport Site (SLAPS), St. Louis, Missouri

Philip A. Schroeder
Chief, Permits Section
Missouri Department of Natural Resources
Water Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176

Dear Mr. Schroeder:

The purpose of this letter is twofold: (1) to reduce the sampling on Outfall 002 to once per year, effective February 2002, until the drainage area is affected by a soil disturbance and, (2) to request the removal of Outfall 003 in June 2002 based upon the remediation to unrestricted use of the impacted surface water area. These outfalls are listed on the compliance documents for the substantive requirements to meet National Pollutant Discharge Elimination System (NPDES) for discharges to waters of the State by the United States Army Corps of Engineers (USACE) at the St. Louis Airport Site (SLAPS) in St. Louis, Missouri.

Outfall 002 is located at the western end of the ditch on the north side of McDonnell Boulevard, next to Coldwater Creek. A removal action to unrestricted use criteria was conducted for the eastern portion of the ditch in 1998 and 1999. The western portion of the ditch is scheduled for remediation in 2004. Since there will be no surface water from disturbed areas flowing over this section for at least two years, the Corps would like to modify the sampling requirements to once per year, effective February 2002, until such time as the drainage area is affected by a soil disturbance. Prior to USACE disturbing the soil, Water Pollution Control Program (WPCP) will be informed and sampling will resume in accordance with the current site ARARs.

Outfall 003, which is located along the north side of the SLAPS adjacent to McDonnell Boulevard, was plugged after a majority of its drainage area had been remediated to unrestricted use criteria and backfilled by the USACE. (The outfall was plugged to prevent migration of clean backfill from the remediated area, which had not been reseeded.) Since the plug prevents flow from Outfall 003, sampling is not feasible. Surface water from the Outfall 003 drainage area is currently being captured in a

sedimentation pond, then discharged to the site sedimentation basin and allowed to flow from Outfall 001a.

Within the Outfall 003 drainage area, only two small areas adjacent to McDonnell Boulevard remain to be remediated. To address surface water drainage when these areas are remediated, a small area will be bermed to capture, test, and treat (if necessary) any surface water, thus preventing drainage to Outfall 003. The USACE anticipates that these removal actions will be complete and the area reseeded by June 2002.

The USACE requests Missouri Department of Natural Resources' concurrence that monitoring/sampling of and reporting on Outfall 003 as part of the USACE's efforts to meet the substantive requirements of the NPDES program cease. Elimination of these requirements will save valuable taxpayer funds without endangering human health or the environment. This request for the removal of Outfall 003 from reporting requirements is based on the fact that its drainage area will not contain contaminated soil above unrestricted use criteria and that no further disturbance of soils is planned by the USACE.

The MDNR WPCP, MDNR Federal Facilities Section, and USACE personnel toured the site and viewed the outfalls in December 2001. At this time the USACE presented its rationale for the reduction of sampling requirements at Outfall 002 and removal of Outfall 003. To assist the MDNR WPCP in its evaluation of the USACE proposal, electronic data from recent sampling events at Outfall 002 were previously sent to Mr. Matt Sikes of your office. A map of the surface water drainage of Outfalls 002 and 003 is enclosed for your information.

A copy of this letter has been forwarded to Mr. Tom Siegel, Mr. Kurt Riebeling, Mr. Eric Gilstrap, and Mr. Matt Sikes, MDNR. If you have any questions, please contact Lou Dell'Orco at (314) 260-3932 or Ron Frerker at (314) 260-3936.

Sincerely,



Sharon Cotner
FUSRAP Program Manager

Enclosure

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Request for Removal Outfall 003 and Reduced Sampling on Outfall 002 from the Applicable or Relevant and Appropriate Requirements (ARARs) for Discharges to Waters of the State by the United States Army Corps of Engineers (USACE) at (SLAPS)

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Company
PM-R

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