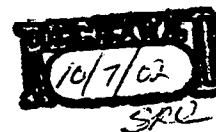




Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.state.mo.us



September 19, 2002

Ms. Sharon Cotner
Project Manager
United States Army Corps of Engineers
8945 Latty Avenue
Berkeley, Missouri 63134

RE: FUSRAP potential impact to buildings surrounding HISS.

Dear Ms. Cotner:

The presence of FUSRAP related contamination within roofing material on property VP2(L) has raised concerns within our department that the contamination could be present on the interior and exterior of this and other surrounding buildings. We hereby request the USACoE to conduct the following:

- Prepare, for regulator review, a workplan to study the potential impact from windborne contamination during FUSRAP material processing at HISS on surrounding buildings.
- A findings or Preliminary Investigation report including data from radiological surveys and sampling of the interior and exterior of suspect buildings.
- Workplans for remedial actions and the subsequent activities (as needed).
- Post Remedial Action Reports and Closure Documents. These could be included as part of on-going soils assessments or removal actions at these sites.
- Present the landowners and regulators with a timeline for completion of this project.

We would not expect the initial investigations of buildings further from the HISS site (please see attached report for explanation) to go beyond a brief sampling and scanning of locations or structures that would most likely be suspect. The results from this initial work would then determine if further study is required. If none

Integrity and excellence in all we do



CF: Cotner, Delia Ordo

Ms. Sharon Cotner
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Page Two

is, then the initial findings and conclusions should be included within the properties' Post-Remedial Action Report after regulator and public review.

Please contact us regarding a time convenient for you to meet and discuss this matter. We also would like to forward this letter to the property owners but would first like to discuss options your staff may suggest for contacting these individuals or organizations. For additional information on buildings surrounding the HISS operations, please refer to the attached report. If you have any questions or comments please do not hesitate to call me at (314) 877-3250, or you may write to 917 N. Highway 67, Suite 104, Florissant, MO 63031.

Sincerely,

HAZARDOUS WASTE PROGRAM



Eric Gilstrap, PE
Environmental Engineer
Air and Land Protection Division

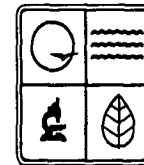
EG:dd

c: Jacque Mattingly, U.S. Army Corps of Engineers
 Dan Wall, U.S. Environmental Protection Agency
 Ric Cavanagh, St. Louis FUSRAP Oversight Committee Chairman

Enclosure: HISS Historical Research on Impact of Dust on Buildings.



FUSRAP
Report on
History of Buildings Surrounding HISS
September 12, 2002



INTRODUCTION

The presence of contamination within roofing material at VP2(L) has prompted concerns that contamination could have impacted other buildings that are close to HISS. Buildings of particular concern would date back to the period in which MED/AEC materials were stored and processed at the Hazelwood Interim Storage Site (HISS) on Latty Avenue. Please refer to the list of conclusions that end this report.

HISS HISTORY (excerpted from the St. Louis Remediation Task Force Report dated September 1996.)

- | | |
|------------------|---|
| Feb. 1966 | "Continental Mining and Milling Co. purchases uranium residues and process wastes at the SLAPSS site from the AEC in early 1966. ... Some of these materials are moved from the SLAPSS to 9200 Latty Ave during 1966 and 1967 under AEC License No. SMA-862." |
| Dec. 29, 1966 | "The Commercial Discount Corporation of Chicago receives AEC license No. SMC-907 allowing them to take possession of the process residues and waste, removal of moisture and shipment to the Cotter Corporation facilities in Canon City, Colorado." |
| Dec. 1969 | "The Cotter Corporation purchases the remaining source material. The AEC's invitation to bid lists the following residues for purchase: 74,000 tons of Belgian Congo pitchblende raffinate containing 113 tons of Uranium; 32,500 tons of Colorado raffinate containing about 48 tons of Uranium; and 8,700 tons of leached barium sulfate containing 7 tons of Uranium." |
| Aug. - Nov. 1970 | "The Cotter Corporation begins drying operations on the Latty Avenue Site..." "...performed for Cotter by B&K Construction Co. and continues until about Nov. 1970. During this period, all the residues are shipped to Canon City, with the exception of approximately 10,000 tons of Colorado raffinate and 8,700 tons of leached barium sulfate waste." |
| July - Oct. 1973 | "Cotter ships 1,000 tons of Colorado raffinate to Canon City without drying, and the leached barium sulfate waste, along with 38-39,000 tons of topsoil, is disposed of in West Lake Landfill in St. Louis County." |
| April 1974 | "... AEC, Region III learns of the disposal of the Latty waste at the Waste Lake Landfill." |
| Oct. 25, 1988 | "Since both DOE and NRC have refused to take action at the West Lake Landfill site, MDNR requests that EPA place the site on the Superfund National Priority List (NPL)." |
| Oct. 1988 | "EPA places SLAPSS and Latty on NPL." |

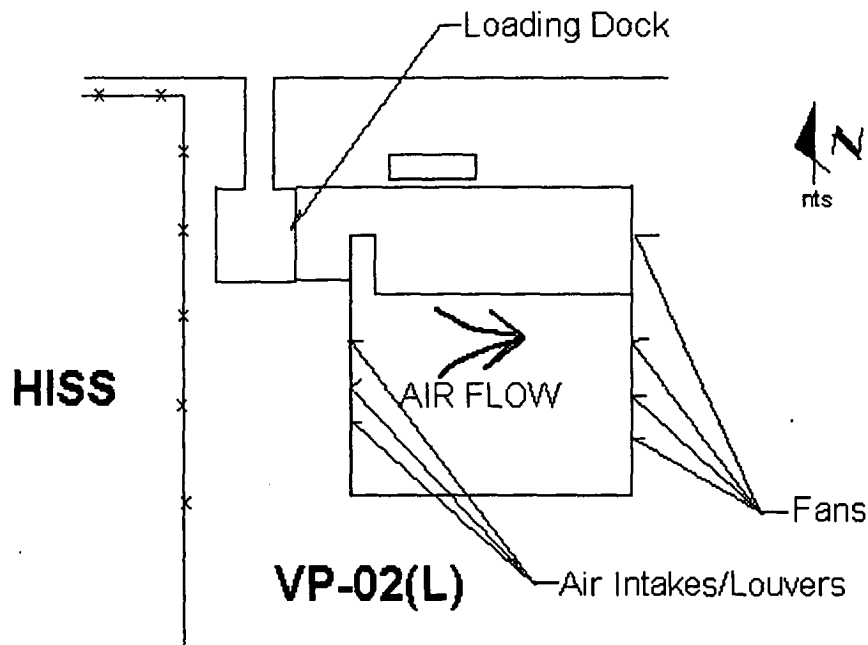
1990

"EPA places West Lake Landfill on the NPL."

VENTILATION SYSTEM FOR INDUSTRIAL BUILDING ON VP2(L)

Radiological contamination within roofing material prompted USACE's, and subsequently the department's, involvement with renovations at the VP2(L) industrial building. Inquiries were made with the tenant regarding the ventilation system. The offices have rooftop-mounted air conditioners and vents. The manufacturing part of the building has some rooftop vents but building temperature is moderated during most of the year with large fans located in the east wall. They pull air through the building from vents and open loading dock doors in the west wall. The tenant advised the plant had operated this way since the time it was constructed.

The HISS operations were located immediately west of this building, which is the direction from which air is pulled through the building for ventilation.



AERIAL PHOTOS AVAILABLE AT ST. LOUIS COUNTY GOVERNMENT PLANNING DEPARTMENT

1937	1" = 600'
1953	1" = 500'
1962	1" = 2,000'
1966	1" = 2,000'
1968	1" = 1,000'
1971	1" = 1,000'
1975	1" = 2,000'
1979	1" = 2,000'
1981	1" = 200'
1983	1" = 2,000'
1985	1" = 200'
1989	1" = 2,000'
1990	1" = 400'
1992	1" = 2,000'
1993	1" = 400'
1995	1" = 400'
1997	1" = 400'

Bold text represents copies of maps obtained for the North
St. Louis County FUSRAP project.

OBSERVATIONS FROM AERIAL PHOTOS

- The 1968 photograph shows mounds, haul roads, and buildings on the HISS property and FUTURA Vicinity Property. The buildings are the same as those now used by FUTURA Coatings and appear in the photograph to be part of the HISS operations. A deed search will be conducted to find out who owned the lot on which these buildings sat.
- The wind direction for this area is typically blowing easterly or northeasterly. Those vicinity properties within 1,000' of HISS, located in a predominately downwind direction, and occupied by buildings that are visible in the 1968 photograph, include VP-02(L) and VP-03(L).
- VP-01(L) and VP-09(C) are occupied and located within 1,000', but would be subject, respectively, to the occasional northerly and less frequent southwesterly winds.
- VP-04(L) and VP-05(L) are occupied and are located in the predominantly easterly wind direction, and are between 1,050' and 1,700' away.
- VP-39 is occupied and is located to the northwest, and approximately 2,270' away.

DEED SEARCH FOR THE FUTURA VP

A deed search was conducted to confirm if buildings on the site were likely to be affiliated with the HISS operations, as is suggested by the 1968 aerial photos. The search did confirm that the Commercial Discount Corp. [possessor of "AEC license SMC-907 allowing them to take possession of the process residues and waste,

removal of moisture and shipment to the Cotter Corporation facilities in Canon City, Colorado." (excerpted from the St. Louis Remediation Task Force Report dated September 1996.)) owned the property as recently as 1976. This is recorded as follows:

County ID: 10K51-0023

List of Transactions (most recent first)

Date of Deed: Dec. 19th, 1978
Date of Filing: April 23rd, 1981
From: E. Dean Jarboe
To: Jarboe Realty & Investment, Co.
Recorders Book and Page: 7326, 656

Date of Deed: June 1, 1977
Date of Filing: June 1, 1977
From: Bayless Company
To: Jarboe, E. Dean
Recorders Book and Page: 6958, 1600

Date of Deed: Aug. 6, 1976
Date of Filing: Aug. 9, 1976
From: Commercial Discount Corp.
To: Bayless Company
Recorders Book and Page: 6888, 524

CONCLUSIONS

1. The interior of the FUTURA buildings, including any floor drains and impacted sewers, should be studied, due to their affiliation with operations conducted by the Commercial Discount Corp.
2. The interior of the buildings located on VP-02(L) should be investigated because contamination has already been found on top of the building and the ventilation was very susceptible to pulling in dust from the HISS site.
3. Possible presence of FUSRAP contamination on or in buildings located at VP-02(L), VP-03(L), VP-01(L), VP-09(C), VP-04(L), VP-05(L), and VP-39 should be studied. An extensive survey and sampling event for each property may not be required. Instead, the extent of investigation on each property should be dependent on the potential for impact as determined by preliminary findings from key locations or property immediately upwind from each other (with the wind originating from a direction corresponding to HISS).

Eric Miltrey

FUSRAP Document Management System

Year ID

00 3371

Further Info?

☐

Operating Unit

North County

Site

HISS

Area

MARKS Number

FN:1110-1-8100g

Primary Document Type

Site Management

Secondary Document Type

Correspondence

Subject or Title

MDNR Concerns Regarding FUSRAPs Potential Impact to Buildings Surrounding HISS

Author/Originator

Eric Gilstrap

Company

MDNR

Date

9/19/2002

Recipient(s)

Sharon Cotner

Company (-ies)

CEMVS-PM-R

Version

Final

Original's Location

Central Files

Document Format

Paper

Confidential File?

☐

Comments

SAIC number

Bechtel ID

Include in which AR(s)?

☒ North County

☐ Madison

☐ Downtown

☐ Iowa

ETL

01.01

Filed in Volume

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