

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

Mel Carnahan, Governor • Stephen M. Mahfood, Director

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

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: Request for Information

Dear Ms. Cotner:

In earlier correspondence, the Missouri Department of Natural Resources (MDNR) recommended the USACE plug the railcar gondola drains, when the gondola contained contaminated soil or had yet to be decontaminated. On January 6, 2000, USACE responded by letter stating the closure of the drain holes at the bottom of the railcars was not necessary. The reason given was because in some cases the shipment is unregulated, or in others, the inner liner meets packaging requirements.

MDNR concurs, 49 CFR 173.24 - *General Requirements for Shipments and Packaging*, does not specify closure of the drains when shipping materials categorized as "unregulated." Also, we concur that keeping a container leakproof would pertain to the packaging required of the Class 9 shipment. The latter exempts the railcar if the material shipped is stored within another packaging material meeting Federal regulations. However, the finding of contaminated water within the railcar would classify the entire car as having to meet general "bulk packaging" requirements for Class 9.

USACE provided the following results from the railcar Envirocare found to be leaking:

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Nuclide Name	Nuclide ID	Confidence	Wt. Mean Activity (pCi/Liter)	Wt. Mean Activity Uncertainty
PB-210		0.999	2.810E+002	1.899E+002
BI-214	@	0.999	1.538E+003	8.147E+001
PB-214	@	0.956	1.475E+003	6.838E+001
TH-234		0.330	1.731E+002	1.095E+002
U-234		0.570	2.429E+003	6.812E+003
U-235	@	0.519	2.258E+001	1.277E+001

? = nuclide is part of an undetermined solution

X = nuclide rejected by the interference analysis

@ = nuclide contains energy lines not used in Weighted Mean Activity

Errors quoted at 2.000 sigma

In previous discussions, USACE mentioned finding elevated levels only of Bismuth and Lead. What about the high levels of Thorium-234 and Uranium-234? It's true, the analytical results had extremely high errors, but all that does is show additional analysis was required. Also, no results were obtained for Uranium-238, Thorium-230, Thorium-232, Radium-226, and Radium-228. The analysis showed concerns should exist, but an adequate study of potential contaminants was not performed.

MDNR again makes the assertion that the railcar drain holes should be kept plugged while containing materials from FUSRAP and after (prior to decontamination). Enclosed, dedicated railcars are preferred.

MDNR requests the following background information and comments for your response:

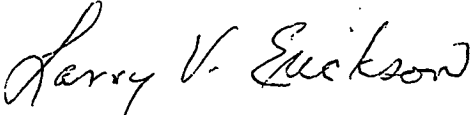
1. Please provide the classification (or other appropriate means of reference) of the railcar shipment Envirocare found to be leaking.
2. Please provide a copy of the "shipping manifest" and listing of the appropriate shipment classification.
3. Has Envirocare or USACE found any other railcars from the St. Louis FUSRAP project to have been draining?
4. Please identify actions taken by USACE after this incidence.
5. Please supply results of testing used to classify the "Burrito Wrap" as a Type A package.
6. **Out of response to the sample results provided by USACE, MDNR again makes the assertion that the railcar drain holes should be kept plugged while containing materials from FUSRAP and after (prior to decontamination). Enclosed, dedicated railcars are preferred.**

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Any additional comments or information you may have to clarify the matter is appreciated. If you have any questions or need clarification on our inquiries, please contact Ms. JoAnne Wade, at 314-877-3250.

Sincerely,

HAZARDOUS WASTE PROGRAM



Larry Erickson, P.E.  
DOE Unit Chief  
Federal Facilities Section, HWP

LE:lg

c: Dan Wall, EPA, Region VII  
Richard Cavanagh, Oversight Committee County Chairperson  
Anna Ginsberg, Oversight Committee County Chairperson

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# Administrative Record for the Formerly Utilized Sites Remedial Action Program (FUSRAP) North St. Louis County Sites

St. Louis County, Missouri

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**US Army Corps  
of Engineers**  
St. Louis District®

Volume 8.1a  
Public Affairs/Community Relations  
Correspondence

SLAP\_000728

## Data Entry Form

{Technical Managers fill in C through G. Document Managers fill in the rest}

A. Document ID Number: Will be assigned by database 00-56 B. Further Information Required?: ☐

C. Primary Category: (Choose One):

USACE ☐  
St. Louis Sites ☐  
Downtown ☐  
North County ☐  
~~Madison Site~~ ☒  
Inaccessible Areas ☐  
PRP ☐  
Oversight Committee ☐

D. Site (Optional):

SLDS VP ☐  
Mallinckrodt ☐  
SLAPS ☒  
SLAPS VP ☐  
CWC ☐  
HISS ☐  
~~Madison~~ ☒

E. Area (Optional): \_\_\_\_\_

F. Primary Document Type (Choose One):

Site Management Records ☐  
Removal Response ☒  
~~Remedial Investigation~~ ☒  
Feasibility Study ☐  
Record of Decision ☐  
Program Management ☐

Remedial Design ☐  
Remedial Action ☐  
Public Affairs/Community Relations ☐  
Congressional Relations ☐  
Freedom of Information Act Requests ☐  
Real Estate ☐

G. Secondary Document Type (see back of form): Col. S. Cotruel

H. Bechtel Number: \_\_\_\_\_

I. SAIC Number: \_\_\_\_\_

J. MARKS Number(Choose One): FN: 1110-1-8100e ☐ FN: 1110-1-8100f ☐ FN: 1110-1-8100g ☒

K. Subject: Request for Info Clarification on Honda Car Drainholes

L. Title: \_\_\_\_\_

M. Author: Larry Erickson

N. Author's Company: MDNR

O. Recipient: S. Cotruel

P. Recipient's Company: \_\_\_\_\_

Q. Version (Choose One): Draft ☐

Final ☒

R. Date: 3/20/00

S. Include in the ARF? ☐

T. Include in the AR? ☐

U. Filed as Confidential/Privileged? ☐

V. To Be Microfilmed? ☐

W. Document Format (Choose one):

Paper ☒  
Electronic ☐

Photographic ☐  
Audio-visual ☐

Cartographic/Oversize ☐  
Microform ☐

X. Physical Location (Choose One):

Central Files ☒  
Records Holding Area ☐

Microfilm Vendor ☐ In ARF ☐  
Department of Energy ☐ In AR ☐

Y. Filed in AR Volume Number: \_\_\_\_\_

Z. Associated with Document(s): \_\_\_\_\_