

DEPARTMENT OF THE ARMY ST. LOUIS DISTRICT, CORPS OF ENGINEERS 9170 LATTY AVENUE BERKELEY, MISSOURI 63134

March 4, 1998

134-60A-6AM-00064

52-1372

REPLY TO ATTENTION OF:

Formerly Utilized Sites Remedial Action Program Project Office

Mr. Scott F. Honig Federal Facilities Section Missouri Department of Natural Resources P. O. Box 176 Jefferson City, MO 65102-0176

SUBJECT: RESPONSE TO MDNR LETTER CONCERNING ST. LOUIS SITE RESPONSE DURING WATER LINE REPAIR ON BANSHEE ROAD, DECEMBER 24, 1997

Dear Mr. Honig:

In response to your letter, dated December 24, 1997, regarding the subject correspondence, the following information is being provided:

Comment #1: Can you give an explanation why the water samples show a high concentration of Thorium 16.68 pCi/L since Thorium is very insoluble? The water results for Thorium are greater than a majority of the result from the groundwater sampling at SLAPS and HISS.

After a thorough review of laboratory data taken during our most recent responses to water line breaks, we found that water sample data discussed in the referenced letter was inadvertently reported from a previous water line response. This sample was actually taken during a water line break which occurred on June 19, 1997 during a valve repair on McDonnell Boulevard. The sample results were an attachment to that letter. Although one water sample result collected during the valve repair had a thorium concentration of 16.68 pCi/L, the result was well below the current maximum Derived Concentration Guide (DCG) for drinking water (300 pCi/L). The June water sample was taken within the confines of the excavated area and was taken concurrently with the soil samples. No water sample was collected from the recent Banshee Road event.

Comment #2: Where were the samples taken from? Only the location of the soil samples were given in the letter.

The soil and water samples from the June 19 water line repair were taken within the confines of the excavated area and were taken concurrently. No water sample was taken during the Banshee Road response, as no water was present within the excavation limits of the Banshee Road event.

Comment #3: No water sample results were given in the letter.

All results from the June 19 water line repair were reported in the response to the water company. No water sample was taken during the Banshee Road response.

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Comment #4: How long had the water been in contact with the soil before the water was sampled? When were the water samples taken, before or after the soil samples?

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The June 19 samples were taken within the confines of the excavated area and were taken concurrently. The amount of time in which the water was in contact with the soil in unknown. No water sample was taken during the Banshee Road response.

Comment #5: What were background levels?

The background concentration for thorium for soil in the St. Louis area is 1.3 pCi/g. Historical (1992-1996) average background for surface water is 0.18 pCi/L for thorium-230.

Comment #6: " Is there a plan to handle large quantities of contaminated water for these types of occurrences? If yes, please submit the plan to MDNR.

There is not a specific plan to address large amounts of contaminated water during a line break. Our past experience has demonstrated that it is very unlikely that we would have a situation in which we would have concentrations of contaminated water in excess of our current cleanup guidelines. In addition, a St. Louis Site (SLS) utility response policy has been developed and is currently under review by the local utility companies. This policy outlines the responsibilities and procedures for SLS personnel during planned and unplanned utility response.

Comment #7: Are there plans to manage disposal of contaminated soil if it becomes accessible during repairs or future utility construction?

During routine utility responses, when it is inappropriate to place contaminated materials back into the excavated area, the USACE is prepared to containerize and disposition this material.

Please contact Mike Feldmann at (314) 524-6821 if you have additional questions or concerns regarding our response to planned and unplanned utility activities.

R. L. Mullins, Jr., Ph.D., P.E., AICF FUSRAP Program Manager

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Formerly Utilized Sites Remedial Action Program (FUSRAP)

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