

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

March 30, 1998

Mr. Rob Mullins, Jr. Ph.D, P.E., AICP, Esq.
Project Manager, USACE
FUSRAP Office
9170 Latty Avenue
Berkeley, MO 63134

RE: St. Louis Airport Site (SLAPS), West End Remedial Action Summary Report

Dear Dr. Mullins:

The U.S. Army Corps of Engineers (USACE) has submitted for agency review the SLAPS west end remedial action summary report. As part of the SLAPS Interim Action Engineering Evaluation and Cost Analysis, approximately 5,000 cubic yards of contaminated soil was removed from the west end. The activities took place from September 29, 1997, to December 5, 1997. The area excavated was next to Coldwater Creek and was to provide a barrier between the contaminated portion of SLAPS and Coldwater Creek. This summary report was submitted to meet the request made by the Federal Facilities Section (FFS) and provides information, e.g., Post Ra data, and air monitoring data on the excavation work conducted at the west end of SLAPS. FFS, along with other MDNR programs, has reviewed the above referenced document and require additional information to get a clear picture of the events that occurred during the excavation from September 29, 1997, to December 5, 1997.

1. Document doesn't include detailed post remedial maps, e.g., show final condition of site.
2. Document doesn't include a chronological time line of events. The time line should include unusual events, e.g., work stoppage, finding of drums, etc.
3. The document provides results from organic sampling with field screening equipment but doesn't state why monitoring was done.
4. Report doesn't include sampling results from Coldwater Creek, i.e., before, during, and after. Bechtel indicated that this sampling would be done.

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5. Why aren't other radionuclides listed as constituents of concern in Section 3.1 "Pre-Remediation Activities"? Why aren't the results from these pre-remediation activities not included in this report?
6. Why was the compaction level changed from 95% to 90%?
7. Why was the soil (Clay backfill material) not tested for other contaminants?
8. Table 3-2, "Field density and Moisture Content Test Results," doesn't include area 1 results?
9. What is status of groundwater well abandonment in the west end area?
10. Uranium results were not listed on figure 5-2?
11. Didn't air monitoring show an exceedance of the DAC at Eva Loadout Station? Because of this, workers that unloaded the trucks were placed on respirators. Why was this not stated in the report? Expect to see events that changed work procedures in this report.
12. What does "OV" mean? (Air monitoring data sheets, direct readings).
13. Were samples run through a gas chromatography unit? If yes, then why were samples run and what were the sample results? What reference chemicals were used in the unit?
14. Was the chemical data in this report validated by someone else then the laboratory?
15. Section 5.2, page 17, suggests that post-remedial action soil sample results indicate that radionuclide concentration from the southeast corner of Area 1 are above soil guidelines and that sample results show Areas 2 through 6 meet soil guidelines. However, the post-remedial action sample results presented in Appendix C, page 1, indicate that 14 of the 25 sampling locations exhibit radionuclide concentrations whose sum-of-the-ratios are greater than 1 and therefore, exceed the soil guidelines established by DOE. (Figure 5-2 illustrates the sampling locations). Locations where sample results show the sum-of-the-ratios to be greater than 1 are found in Areas 1, 2, 3, 4, 5, and 6.

Are Areas 2 through 6 not subject to future remediation efforts? Why were these areas not remediated during the Phase 1A excavation? Please explain and clarify.

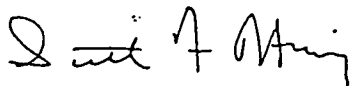
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Providing sample calculations (sum-of-the-ratios) would be beneficial in the review of the post-remedial action soil sample results.

If you have any questions or comments, please contact Scott Honig at (573) 751-3087. Thank you for the opportunity to comment.

Sincerely,

HAZARDOUS WASTE PROGRAM



Scott F. Honig
Environmental Engineer, FFS

SH:lg

c: Dan Wall, U.S. EPA - Region VII

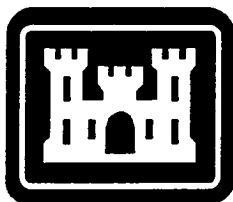
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Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for the St. Louis Sites, Missouri



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