

JUN 25 REC'D

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**  
DIVISION OF ENVIRONMENTAL QUALITY  
P.O. Box 176 Jefferson City, MO 65102-0176

June 23, 1999

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: Post-Remedial Action Report (PRAR) for the Remedial Actions conducted in  
St. Louis, Missouri, during Calendar Year 1997

Dear Ms. Cotner:

The Federal Facilities Section (FFS) has reviewed the Draft St. Louis Airport Site (SLAPS) West End Remedial Action Summary Report (January 30, 1998). U.S. Army Corps of Engineers provided responses to FFS comments in an April 30, 1998, letter. Many of the comments suggested that much of the requested information in the letter of March 30, 1998, could be found in the 1997 PRAR. FFS received the 1997 PRAR on March 22, 1999. After reviewing the 1997 Calendar Year PRAR, FFS believes the requested information was not in the PRAR.

1. MDNR question (March 30, 1998, letter): Document doesn't include detailed post-remedial maps, e.g., show final condition of the site.

USACE response (April 30, 1998, letter): An as-built drawing will be included in the Calendar Year (CY) 1997 Post Remedial Action Report (PRAR).

1997 CY PRAR (March 22, 1999): Appendix D didn't include the as-built drawings.

2. MDNR question: Report doesn't include sampling results from Coldwater Creek, i.e., before, during, and after excavation. Bechtel indicated that this sampling would be done.

USACE response: The pre-RA surface water samples, as well as those collected during the remediation, were collected and analyzed for the radiological constituents of concern. These results will be included in the PRAR. The post-RA surface water samples from Coldwater Creek are scheduled to be taken during the next environmental surveillance of SLAPS. These results will be forwarded via the routine quarterly report.

1997 PRAR: Page 22, Section 3.3.1, before, during, and after the SLAPS Phase 1A work, surface water samples were collected from Coldwater Creek to be analyzed for the radiological contaminants of concern. The sampling results for the pre-RA surface water

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sample as well as those collected during remediation are included in Appendix C. The post-remedial action surface water samples from Coldwater Creek have been collected during the latest Environmental Surveillance of SLAPS in April 1998. A summary of the results will be provided via the routine quarterly report.

Appendix C doesn't include the requested information on surface water samples. Appendix C contains the Post Remedial Action soil sample results for SLAPS West End and SLAPS West End excavation chemical data for areas 1 through 6.

3. MDNR question: 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.

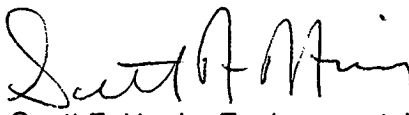
USACE response: MDNR and DGLS were on-site during the West End remedial action. The regulatory agencies were also kept informed of our progress by the weekly regulatory reports and the BI-weekly telephone conference. Unusual events, which have a significant impact on the post-RA status of SLAPS, will be noted in the CY 1997 PRAR.

1997 PRAR: The PRAR does cover the compaction of back fill and provides the results of compaction test. There is no discussion that the plan called for 95% compaction of back fill but the contractor couldn't reach that specific compaction level. The PRAR also doesn't discuss the schedule changes because of weather, e.g., rain or the finding of drums, one gallon glass containers, or workers required to wear respirators (air monitoring results > 10% DAC limit) if working in the dump trucks removing the protective liners. This information provides a complete picture of the remediation process for the public to review. The information can explain delays in excavation, changes in workers PPE, possible exposure pathways, or new contaminants of concern.

If you have any questions, or need further information, you may contact me at (573) 751-3087.

Sincerely,

HAZARDOUS WASTE PROGRAM



Scott F. Honig, Environmental Engineer  
Federal Facilities Section

SH:lg

c: Dan Wall, EPA Region VII  
Eric Gilstrap, FUSRAP Field Office

Cataloging Form  
{Technical/Project Managers fill in C through G, K through Q. RM completes other fields}

A. Document ID Number: Assigned by database 774

B. Further Information Required?: ☐

C. Operable Unit (Choose One):

USACE	<input type="checkbox"/>
St. Louis Sites	<input checked="" type="checkbox"/>
Downtown	<input type="checkbox"/>
North County	<input type="checkbox"/>
Madison Sites	<input type="checkbox"/>
Inaccessible Areas	<input type="checkbox"/>
PRP	<input type="checkbox"/>
Oversight Committee	<input type="checkbox"/>

D. Site (Optional):

SLDS VPs	<input type="checkbox"/>
Mallinckrodt	<input type="checkbox"/>
SLAPS	<input type="checkbox"/>
SLAPS VPs	<input type="checkbox"/>
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E. Area (Optional): \_\_\_\_\_

F. Primary Document Type (Choose One):

Site Management Records	<input checked="" type="checkbox"/>	Remedial Action	<input checked="" type="checkbox"/>
Removal Response	<input type="checkbox"/>	Public Affairs/Community Relations	<input type="checkbox"/>
Remedial Investigation	<input type="checkbox"/>	Congressional Relations	<input type="checkbox"/>
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Record of Decision	<input type="checkbox"/>	Real Estate	<input type="checkbox"/>
Remedial Design	<input type="checkbox"/>	Project Management	<input type="checkbox"/>

G. Secondary Document Type (see back of form): Correspondence

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/Title: MDNR Comments on the Calendar year 1997 Post Remedial Action Report (PRAR)

L. Author: Scott Haring M. Author's Company: MDNR

N. Recipient(s): Sharon Cotru O. Recipient(s) Company: PM-R

P. Version (Choose One): Draft ☐ Final ☒ Q. Date: 6/23/99

R. Include in the ARF? ☐ S. Include in the AR? ☐ T. Filed as Confidential/Privileged? ☐

U. Document Format (Choose one):

Paper	<input checked="" type="checkbox"/>	Photographic	<input type="checkbox"/>	Cartographic/Oversize	<input type="checkbox"/>
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X. Associated with Document(s): \_\_\_\_\_