



Bob Holden, Governor • Stephen M. Mahfood, Director

**DEPARTMENT OF NATURAL RESOURCES**

www.dnr.state.mo.us

June 20, 2003

Ms. Sharon Cotner  
FUSRAP Program Manager  
United States Army Corp of Engineers  
8945 Latty Avenue  
Berkeley, MO 63134

Re: Comments on the Final Status Survey Plan for Structures and Other Consolidated Material Left in Place at the St. Louis Sites

Dear Ms. Cotner:

The Federal Facilities Section of the Missouri Department of Natural Resources has completed reviewing the above-referenced document. Although the document laid out the final status survey plan in a clear manner, the remediation goals and investigation levels for release of materials left in place were never clearly defined. We also acknowledge the plan states that derived concentration guidelines (DCG) are outside the scope; however, the document has no practical application until these DCG's have been declared. It is necessary that the U.S. Army Corps of Engineers (USACE) propose clear-cut cleanup criteria for structures and other consolidated material. Because the proposal is a remedy defining plan it needs to be presented to the public and regulators since it has not been addressed in any decision document to date. Another issue requiring clarification is whether this work plan is specifying release for interior as well as exterior building surfaces. In order for the department to concur with this document these items must be addressed as well as the specific comments that follow.

## Page 15, Section 4.3.4

- Please explain how the USACE plans to determine background levels. What are the background reference areas that will be used to determine background?

## Page 23, Section 5.3.3

- The evaluation does not mention "radon sampling for the interior of buildings". Will the USACE monitor for radon?

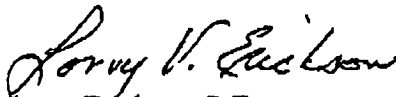
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Thank you for including the state in the review process for this document. We appreciate the coordination from the USACE and look forward to your timely responses to these comments. If you have any questions or concerns, or require any further clarification on these comments please call Jill Groboski or Eric Gilstrap of my staff at (314) 877-3250. In addition, you may direct written inquiries to 917 N. Hwy. 67 - Suite 104, Florissant, MO 63031.

Sincerely,

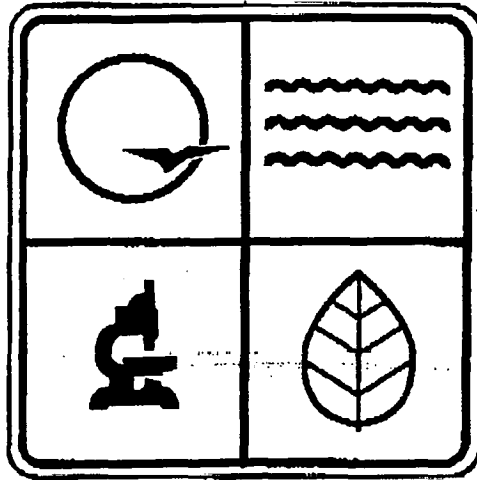
HAZARDOUS WASTE PROGRAM



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

JG:led

c: Mr. Daniel Wall, United States Environmental Protection Agency  
Ms. Jacque Mattingly, United States Army Corps of Engineers  
Mr. Dennis Chambers, United States Army Corps of Engineers



# Missouri Department of Natural Resources FAX Transmittal

Cover Sheet

TO: Sharon Cotner

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COMMENTS: hard copy to follow

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