

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Bob Holden, Governor • Stephen M. Mahfood, Director

www.dnr.state.mo.us

October 22, 2004

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

RE: North St. Louis County Haul Road Analysis and Justification for Additional Investigation
– Evaluation of Inaccessible Materials Beneath Pavements, Rev. B1, Sept. 15, 2004

Dear Ms. Cotner:


This letter pertains to the review of Revision B1 of the North St. Louis County Haul Road Analysis and Justification for Additional Investigation. We agree with most conclusions made within the report; however, there are a couple instances where roads have been deemed “unimpacted” but need more supporting evidence, OR a change in stance. Also, additional information obtained as the FUSRAP project progresses might prompt us to request that some areas be reconsidered for investigation. Examples of when this would occur are provided in the attached list of comments.

The list of historical references for this document is impressive. We do not have some of them within our library so we may contact your staff to review and/or obtain copies. The purpose is to improve our record inventory and knowledge.

Thank you the opportunity to review and comment on this document. We look forward to receiving your response. If you have any questions or need further clarification, please call me at (314) 877-3250. Please direct any written communication to me at the Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176.

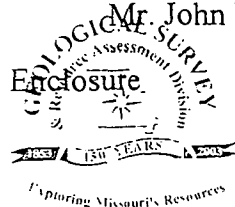
Sincerely,

HAZARDOUS WASTE PROGRAM


Eric Gilstrap, P.E., Environmental Engineer
Federal Facilities Section

EG:dd

cc: Mr. Daniel Wall, U.S. Environmental Protection Agency, Region VII
Ms. Enola Cuffolt-Tullos, St. Louis County Department of Highways & Traffic
Mr. Tom Manning, City of Hazelwood
Mr. John Langerak, City of Berkeley



Integrity and excellence in everything we do



CF: [unclear] [unclear] [unclear]

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Detailed Comments on the

North St. Louis County Haul Road Analysis and Justification for Additional Investigation – Evaluation of Inaccessible Materials Beneath Pavements, Rev. B1, Sept. 15, 2004

1. **Page A-10, Last Paragraph, Conclusions regarding Eva evaluation.**

"The HISS to Westlake Landfill Site: In 1973 Eva Avenue had an AC surface, and this pavement should have protected the material under it."

This statement, and conclusions documented elsewhere in the report regarding this segment of Eva, should be revised unless there is more historical information that shows repairs were made to this road prior to 1973. Here are some related points to consider:

- Page 9 provides a summary of instances when material underneath a paved roadway might be suspected of potential impacts. It says *"Structural Failure of pavement, AC, or PCC. Such a failure could have allowed a route for impacting agents to enter locations that are under the pavement. Also, the repair of structural failures generally requires the removal and replacement of the existing surface and any failed subgrade material. Pavement repairs could have resulted in the movement of possibly impacted material to locations that were previously protected by pavement."* We agree with this statement.
- It also says *"While the mechanisms listed above could result in impacts to material located under otherwise protective pavements, the conclusions of this report are based on the judgement that the chances of such impacts are too low to justify additional testing of inaccessible material under substantial pavements."* We feel the truth of this statement is dependent upon many factors, and that a severely dilapidated paved road (open potholes, large and numerous cracks, etc) is an example of a case that would still warrant further investigation.
- The historical information and summary of critical facts sections on pages A-8 and A-9 says aerial photos in 1971 show the paved portion of EVA was in "very poor condition".
- The same sections of the report show that the earliest evidence of it being repaired doesn't appear till after 1973 in a May 6, 1974 aerial photo.

2. **Page A-21, Conclusions Regarding Latty Ave (west of Hazelwood Ave) evaluation.**

The conclusions listed here, and on other summary pages, notes that impacts no longer should exist because the DOE had remediated this ground during road removal and reconstruction in 1984. We t currently agree with this statement, but we may have more questions in the near future. We first need to re-examine the historical DOE documentation and related regulatory comments and responses.

3. **Page A-27, Last Paragraph, Conclusions regarding I-170 evaluation.**

"I-170 crosses over the Norfolk Southern railroad main line and part of a real rail yard. There is some light chance that these rail facilities may have been used to haul residue from the HISS to Cotter Company's processing mill in Colorado. This impact should have been too small to warrant additional testing."

Please change this to conclude that some investigation will be done OR rather a need for investigation will be determined based on data that documents whether impacts from spillage

are seen on nearby rail lines leading up to the rail yard. Eliminating an area from investigative sampling, based on subjective statements like "this impact should have been too small to warrant additional testing," is not consistent with MARSSIM.

4. **Page A-44, Seventh Paragraph. Typographical suggestion.**

"In the May 4, 1971, aerial photograph contained in the August 1992 EPA Region VII study, Nyflot Avenue the pavement does not appear to have changed in alignment, width, or pavement type since the 1984 photograph."

This sentence maybe missing a couple of words and needs a date corrected.

5. **Page A-47, Last Paragraph. Spelling suggestion.**

Was the word "transportation" intended rather than "transpiration"? This came from the following statement: *"Results of the Radiation Measurements Take of Transpiration Routes (LM004) in Hazelwood, Missouri..."*

FUSRAP Document Management System

Year ID
00 4463

Further Info?
☐

Operating Unit
North County

Site
SLDS VPS

Area

MARKS Number
FN:1110-1-8100g

Primary Document Type
Remedial Investigation

Secondary Document Type
Correspondence

Subject or Title

MDNR comments on the North St. Louis County Haul Road Analysis and Justification for Additional Investigation-Evaluation of Inaccessible Material Beneath Pavements, Revision B1, dated September 15, 2004

Author/Originator
Eric Gilstrap

Company
MDNR

Date
10/22/2004

Recipient (s)
Sharon Cotner; Dan Wall

Company (-ies)
FUSRAP; USEPA; St. Lo

Version
Final

Original's Location
Central Files

Document Format
paper

Confidential File?
☐

Comments

Include in which AR(s)?

- ☒ North County
☐ Madison
☐ Downtown
☐ Iowa

ETL
0301

SAIC number

Filed in Volume
03

Bechtel ID

