



Mel Carnahan, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

May 5, 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: Environmental Monitoring Program Plan for the St. Louis Sites

Dear Ms. Cotner:

The Federal Facilities Section (FFS) is enclosing a list of comments developed during the review of the Environmental Monitoring Program Plan for the St. Louis Sites.

1. Table 1: Groundwater ARAR 10 CSR 23-4 should be referenced and included in future documents relating to SLAPS and HISS.
2. Section 1.1: What is the proposed schedule for issuance of the initial Environmental Monitoring Implementation Plan (EMIP)? In addition, what will be the annual release date of the EMIP documents?
3. Page 6, Section 1.2.1, Program objectives: The plan should summarize the site specific environmental permits and substantive requirements, e.g., ARAR for SLAPS, MSD discharge limits for SLDS, and FFA requirements. An example of reporting requirements would be the WPCP issued ARARs require a discharge monitoring report to be submitted by 28th of the month following the completed reporting period. Table 1 on page 3 could be expanded to include the additional information, i.e., permits along with reporting requirements and limits. An example of limits would be the trigger levels for the groundwater perimeter monitoring required in the SLDS ROD (page 80) found in 40 CFR Part 192. Page 7, Section 1.2.2, Program Scope and Strategy: The EMPP states that, "The EMPP establishes an integrated monitoring network with sampling locations and frequencies defined on the basis of permit conditions, substantive requirements or best professional judgement, within the EMPP structure." The EMPP should document this monitoring network between USACE and the TERC contractors. Currently, the EMPP references several other documents, i.e., sampling analysis plans (SAPs). I have to

use three different SAPs to review groundwater-monitoring locations. The Draft Final Sampling and Analysis Program Plan for the St. Louis site does not include maps of the groundwater well locations for SLAPS or SLDS but does have necessary standard operating procedures for sampling. To find the appropriate map of ground water well locations, I have to look at either the St. Louis Airport Site SAP or the St. Louis Downtown Site SAP. If a reference can be incorporated into this document, e.g. maps, then please look at including those items. I know some references are complete documents and should remain as references, such as SLAPS EE/CA. The document should be easy to use for regulators, contractors, and the public, i.e. St. Louis Remediation Oversight Committee.

4. Section 1.2.2: The document indicates that sampling activities may be eliminated from a subsequent EMIP when monitoring is no longer pertinent. Although an example of sample elimination for an area where no further contaminated media exists, it is not clear how "pertinent" sampling requirements will be defined. In addition, post-remediation compliance monitoring will be necessary for some media.
5. Section 1.2.2: Has the Potential Contaminants of Concern Assessment Memorandum (PAM) been submitted for review and comment? Parameters selected for the EMIP will be partly based on the PCOCs identified in the PAM.
6. Section 1.2.2: The SLDS ROD does not specify groundwater monitoring frequency. Although the FFA does require quarterly reporting of all environmental data collected during the quarter, it does not specify what data must be collected on a quarterly basis. Since part of the Environmental Monitoring Program objective is to collect, evaluate, and report environmental data, the frequency of the data collection needs to be identified. This type of information needs to be specified in the EMIP.
7. Page 7, Section 1.2.2, Program Scope and Strategy: "Certain remedial activities at the site will necessitate an enhanced level of monitoring. The monitoring will demonstrate that the action is conducted in a manner that meets the CERCLA requirements to be protective of human health and the environment and demonstrate short-term effectiveness. For example, an increased level of air monitoring may be needed during excavation of soils at the sites." The question arises who will be responsible for the air monitoring -- the USACE under the EMPP or its Total Environmental Restoration Contract (TERC) contractor? Many of the Remedial Design work plans document air monitoring and other environmental monitoring to be carried out by the TERC contractor. Will the data collected by the TERC contractor be used to meet the requirements of the EMPP?
8. Page 9, Section 2.0 Site History and Description of Each Site: The plan does an excellent job of providing site history and description of each site. This section should include a map of ground water well locations, surface water outfalls, etc. That information can be found in other documents, i.e. Sampling and Analysis Plan for Remedial Action at the St. Louis Downtown Site, but to make this document a stand-alone document, they should be included in this document. If maps are not

included in this document then every year they should be included in the Environmental Monitoring Implementation Plan.

9. Section 2.1: The document states that "Groundwater remedial action alternatives will be evaluated, if long term monitoring of the B Unit shows significant exceedances of the thresholds by the contaminants of concern specified in the ROD." This is an extremely vague statement that could easily be subject to much interpretation and debate. It would be more appropriate if the sentence were to read, "Groundwater remedial action alternatives will be evaluated if monitoring of hydrostratigraphic unit B demonstrates exceedances of established thresholds by the contaminants of concern."
10. Page 16, Section 2.1.4, Site Characterization Summary: "Building 25 (maximum value of 5.0 pCi/L), and Building 101 (maximum level of 4.75 pCi/L) are the only buildings that have been demolished since this monitoring event." Building 25 and 101 have not been demolished as indicated in the SLDS/ROD page 12, "SLDS Buildings 101 and 25 and St. Louis Site's currently inaccessible soils related to MED/AEC activities will be remediated under a future CERCLA action."
11. Section 2.2.2: The document indicates that approximately 12 metric tons (40,200 tons) of leached barium sulfate cake was stored at SLAPS. Please note that 12 metric tons equates to approximately 13.2 tons, while 40,200 tons equates to approximately 36,468 metric tons.
12. Section 2.2.3: The geological description of SLAPS does not clearly explain the thickness of individual Units and subunits. In addition, a more thorough discussion of sitewide Unit and subunit discontinuities should be included.
13. Section 2.2.3: The Geological Survey Program (GSP) agrees that a direct hydraulic communication does not exist between hydrostratigraphic zone C and Coldwater Creek. However, this does not negate the need for further groundwater characterization.
14. Section 4.0: The GSP believes that actions performed under the Environmental Monitoring Program Plan will contribute to the overall monitoring and compliance strategy for the St. Louis FUSRAP sites. The collection, analysis, and reporting of the data obtained under the EMPP will be particularly useful in assessing the effects remediation has on meeting environmental restoration goals. However, it has proven to be unduly difficult to obtain much of this data. Efforts should be made to expedite and ease the process of data transfer to all stakeholders.
15. Page 32, Section 4.0, Program Action: "The underlying database for the EMPP, in order to achieve these monitoring and reporting objectives, will have a structure that allows reporting of monitoring data for all related media." What is the status of the database for maintaining environmental sampling results? What type of access to the database is available for FFS? FFS would not specifically request internet

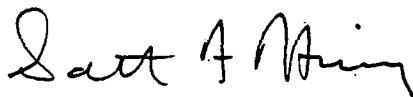
access like what is available with the scheduling (construction/environmental documentation) program but on-site computer access or a file cabinet containing all validated data. At other federal facility sites government agencies have set up dedicated computers for FFS representatives to review and/or download the data on-site. FFS would like to sit down with USACE and discuss this issue.

16. Page 32, Section 4.0, Program Action: "The environmental data collected in accordance with EMIP for the fiscal year will be summarized in the Annual Data and Analyses Report (ADAR). To assist FFS in scheduling work activities for the future, please indicate the estimated date of release of the Annual Data and Analyses Report.

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:g

c: Dan Wall, EPA - Region VII

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

A. Document ID Number: Assigned by database 00-341

B. Further Information Required?: ☐

C. Operable Unit (Choose One):

USACE ☐
St. Louis Sites ☒
Downtown ☐
North County ☐
Madison Sites ☐
Inaccessible Areas ☐
PRP ☐
Oversight Committee ☐

D. Site (Optional):

SLDS VPs ☐
Mallinckrodt ☐
SLAPS ☐
SLAPS VPs ☐
CWC ☐
HISS ☐
Madison ☐

E. Area (Optional): _____

F. Primary Document Type (Choose One):

Site Management Records ☒
Removal Response ☐
Remedial Investigation ☐
Feasibility Study ☐
Record of Decision ☐
Remedial Design ☐

Remedial Action ☐
Public Affairs/Community Relations ☐
Congressional Relations ☐
Freedom of Information Act ☐
Real Estate ☐
Project Management ☐

G. Secondary Document Type (see back of form): Public Notices, Comments Received, Responses to Comments

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: Environmental Monitoring Program Plan

L. Author: Scott Horvitz

M. Author's Company: MDNR

N. Recipient(s): Sharon R. Cotter

O. Recipient(s) Company: PM-R

P. Version (Choose One): Draft ☐ Final ☒

Q. Date: 5-5-99

R. Include in the ARF? ☒

S. Include in the AR? ☒

T. Filed as Confidential/Privileged? ☐

U. Document Format (Choose one):

Paper ☒
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Audio-visual ☐

Cartographic/Oversize ☐
Microform ☐

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W. Physical Location (Choose One):

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Records Holding Area ☐

Microfilm Vendor ☐
Department of Energy ☐

In ARF ☐
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X. Associated with Document(s): _____