

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Roger B. Wilson

~~xxxxxx~~ Governor • Stephen M. Mahfood, Director

DIVISION OF ENVIRONMENTAL QUALITY

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

October 30, 2000

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

Re: St. Louis Airport Site (SLAPS) Implementation Report

Dear Ms. Cotner:

The following is a list of comments compiled by Missouri Department of Natural Resources (DNR) and Division of Geology and Land Survey (DGLS) regarding the above-mentioned document for your review and response.

COMMENTS

1. Page 1-1, 2nd paragraph
 - Why weren't Hazelwood Interim Storage Site (HISS) and Vicinity Properties (VP) included if confirmation of site conditions and assumptions were needed to prepare the Feasibility Study and Proposed Plan (FS/PP)?
2. Page 1-3, Current Site Conditions, 2nd paragraph
 - It is stated that "more than two-thirds of the land within 0.8 kilometers of SLAPS is used for transportation-related purposes...The remaining land is used for commercial and industrial purposes." What about the residents just north of Latty Ave. and east of Hazelwood Blvd.?
3. Page 1-6, Section 1.7 – Site Geology
 - 1st paragraph: There is a discrepancy between two documents concerning the direction of bedrock dip at SLAPS. According to the subject document, the bedrock dips gently to the north-northwest. This may be a typographical error, because it is stated on page 2-17 of the August 2000 SLAPS FS that the bedrock dips to the north-northeast. This inconsistency needs to be resolved. This question is not a significant concern, as far as the review of the subject document, but may have future implications.

- 1st paragraph: "Illinoisan" glaciation should be spelled *Illinoian* glaciation. The spelling should be corrected.
 - 1st paragraph: There are two stratigraphic nomenclature errors in this paragraph. The shale unit is incorrectly identified as the Cherokee Shale Formation. The correct name is the Cherokee Group. The limestone unit is incorrectly identified as the St. Genevieve Formation. The correct name is the St. Genevieve Limestone. St. Genevieve is misspelled in several places in this document.
 - 5th paragraph: Origins of all the soil subunits are described except for Unit 4. An interpretation of the origin of Unit 4 should be provided.
4. Page 2-6, Section 2.3
- Please note the wells have been installed recently.
5. Page 4-2, Table 4-1
- The potential soil IAL values do not correspond to those shown in the FS/PP page D-40.
 - The Potential Soil IAL subsurface value for Total Uranium (234, 235, 238) should be 50 pCi/g.
6. Page 4-10, Table 4-3
- The values in the above mentioned table do not correspond to those in Appendix D-14, Draft FS/PP (Nov. 1999).
7. page 4-26, Section 4.4.1 - Soil Gas Survey, 4th and 5th paragraphs
- It is stated in the 5th paragraph that no soil gas anomalies were detected by the soil gas survey. However, numerous Volatile Organic Chemical or Contaminants (VOC) at very low concentrations were detected at many sampling points according to the information presented in the 4th paragraph. It is unclear why the VOC results are not considered anomalies
8. Page 5-2, Section 5.3
- 5th paragraph: It states, "...sampling results confirm that hazardous characteristics are not associated with any of the radionuclide-impacted soils." However in the 2nd paragraph it states that arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, etc. were found above their respective screening levels. These are all Resource Conservation & Recovery Act (RCRA) hazardous wastes, and, therefore, exhibit hazardous characteristics. Due to this fact, it appears these two paragraphs are in conflict. Please clarify.
9. Page 5-3, Section 5.4
- 5th paragraph: It states, "TCE and 1,2 DCE were detected above their respective MCL of 5µg/L and 70 µg/L, although at low concentrations." This statement is misleading because on page 4-37, section 4.6.3.1; it states the highest concentration of Trichloroethylene (TCE)

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found was 840 µg/L. This is not a low concentration especially when it is compared to the MCL of 5µg/L.

Thank you for taking the above comments into consideration. We look forward to discussing these comments at the Technical Working Group meeting on November 3, 2000. If you have any questions or concerns, please contact me at (573) 751-3087.

Sincerely,

HAZARDOUS WASTE PROGRAM



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A. Document ID Number: Assigned by database 00-371

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

H. Bechtel Number: _____

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J. MARKS Number(Choose One): FN: 1110-1-8100e ☐ FN: 1110-1-8100f ☐ FN: 1110-1-8100g ☐

K. Subject/Title: MDNR Comments on the SLAPS Implementation Report

L. Author: Jill Arboreschi

M. Author's Company: MDNR

N. Recipient(s): Sharon Citnu

O. Recipient(s) Company: PM-R

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

Q. Date: 10/30/00

R. Include in the ARF? ☐

S. Include in the AR? ☐

T. Filed as Confidential/Privileged? ☐

U. Document Format (Choose one):

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Central Files ☒
Records Holding Area ☐

Microfilm Vendor ☐
Department of Energy ☐

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

Secondary Document Types

☐ Amendments to Record of Decision (ROD)
☐ Anomaly Review Board Documents (Management Plan, Correspondence, Standard Operating Procedures, Findings)
☐ Applicable or Relevant and Appropriate Requirements (ARAR) Determinations
☐ Archives Search Reports (ASR)
☐ Briefing Papers
☐ Chain of Custody Forms
☐ Community Relations Plan
☐ Correspondence
☐ Daily Operations Summary/Situation Reports
☐ Engineering Evaluation and Cost Analysis (EE/CA) Action Memo
☐ Engineering Evaluation and Cost Analysis (EE/CA) Approval Memorandum
☐ Engineering Evaluation and Cost Analysis (EE/CA)
☐ Explanation of Significant Differences
☐ Fact Sheets/Newsletters
☐ Feasibility Study (FS) Reports
☐ Federal, State, Local Tech. Records
☐ Final Approved Findings and Determinations
☐ Final Remedial Design Documents
☐ Freedom of Information (FOIA) Requests
☐ Freedom of Information (FOIA) Responses
☐ Health and Endangerment Assessments
☐ Interagency Agreements/Memoranda
☐ Interim Deliverables
☐ Inventory Project Report (INPR) Risk Assessment Code (RAC)
☐ Invoices/Contractor Payments/Cost Reports
☐ Land Grants/Deeds
☐ Mailing Lists
☐ News Clippings and Press Releases
☐ No Further Action Docs (NOFA)
☐ On-Scene Coordinator Reports
☐ Proposed Plans for Remedial Action
☐ Public Meeting Minutes/Transcripts
☐ Public Notices
☐ Public notices, Comments Received, Responses to the Comments
☐ Published Hearings
☐ Record of Decision (ROD)
☐ Reference Documents
☐ Remedial Action Documents
☐ Remedial Investigation (RI) Reports
☐ Removal Response Reports (Emergency Evacuation Orders)
☐ Rights of Entry Documents
☐ Sampling/Analysis Data and Plans
☐ Scopes of Work/Contractual Documents
☐ Site Descriptions and Chronologies
☐ Site Inspection Documents
☐ Site Photographs and Maps
☐ Testimonies
☐ Title Search Documents
☐ Work Logs
☐ Work Plans and Progress Reports
☐ Work Plans/Site Safety and Health Plans and Progress Reports
☐ Work Register and Logs