



REPLY TO  
ATTENTION OF:

CEMVS-PM-R

31 March 2005

## MEMORANDUM FOR RECORD

SUBJECT: Non-significant change to the Record of Decision for the St. Louis Downtown Site

### 1. References:

(a) Environmental Protection Agency (EPA), 1999. A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Documents, Office of Solid Waste and Emergency Response, OSWER 9200.1-23P, EPA 540-R-98-031, July.

(b) EPA, 2000. A Guide to Developing and Documenting Cost Estimates During the Feasibility Study, OSWER 9355.0-75, July.

(c) IT Corporation (IT), 2001a. Pre-Design Investigation Data Summary Report, Gunther Salt North Vicinity Property (DT-4), FUSRAP St. Louis Downtown Site, St. Louis, Missouri, Revision 0, May.

(d) IT, 2001b. Pre-Design Investigation Data Summary Report, Heintz Steel and Manufacturing Vicinity Property (DT-6), FUSRAP St. Louis Downtown Site, St. Louis, Missouri, Revision 0, July.

(e) IT, 2001c. Pre-Design Investigation Data Summary Report, Midwest Waste Vicinity Property (DT-7), FUSRAP St. Louis Downtown Site, St. Louis, Missouri, Revision 0, May.

(f) USACE, 1998. Record of Decision for the St. Louis Downtown Site, St. Louis, Missouri, Final, October.

2. The U.S. Army Corps of Engineers (USACE) is issuing this memorandum to document a non-significant change to the final remedy presented in the Record of Decision for the St. Louis Downtown Site (SLDS ROD) (USACE, 1998). This non-significant change (NSC) is prepared by USACE as lead agency to document minor changes to the scope, performance, and cost of cleanup actions adopted in a remedy-selection document (EPA, 1999). This memorandum will be included in the post-decision document file for SLDS.

3. Following the approval and acceptance of a ROD, circumstances can arise that may warrant a change to certain limited aspects of the selected remedy. The EPA defines three categories of post-ROD change: (1) non-significant (or minor) changes, (2) significant changes, and (3) fundamental changes. Direction on what constitutes each type of change is provided in the EPA guidance document A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents (EPA, 1999). Based on this guidance, non-significant changes are those that "will not have a significant impact on the scope, performance or cost of the remedy".

4. This memorandum describes such a non-significant change. There is no change in performance due to the fact that the expected remediation results and goals are identical to those specified in the ROD. Only a relatively minor change in cost of performance will be realized. In fact, the necessity for this memorandum is merely due to an alteration in the scope of the remedial action. This minor change is best characterized as a clarification of the delineation of the remedial area.

#### SUGGESTED REMEDY AT SLDS

5. The SLDS is located in an industrialized area on the eastern border of St. Louis, bordering on the western edge of the Mississippi River and about 2 miles north of the St. Louis downtown area. As described in Paragraph 1.1 of the SLDS ROD, the SLDS consists of :

...the Mallinckrodt Chemical Works (Mallinckrodt Property)...bordered by a large metal recycling company (McKinley Iron Works) to the north; the Mississippi River, an abandoned food processing plant (PVO Foods), and City of St. Louis property to the east; a large lumber yard (Thomas and Proetz Lumber) to the south; and Broadway Street and small businesses to the west. Additionally, the Norfolk and Western Railroad; the Chicago, Burlington, and Quincy Railroad; and the St. Louis Terminal Railroad Association have active rail lines passing in a north/south direction through the Mallinckrodt Property. An earthen levee between the river and the SLDS protects the area from flood waters. These commercial and city-owned properties are collectively referred to as the SLDS VPs.

6. The ROD further describes, both in text of Paragraph 1.1 and in Figure 1-1, the area associated with the Mallinckrodt Property and the SLDS vicinity properties (VPs) generally as "Remediated Levee Property," "Railroad Properties," "McKinley Iron," "Thomas and Proetz Lumber," "PVO Foods" and "Unremediated City Property". In the intervening years since the completion of the decision document, land ownership has changed, in some cases more than once. Parcels formerly described in landowner blocks were more easily identified by assigning alphanumeric identification numbers to each. Designations currently used for areas described, in whole or in part, in the text of Paragraph 1.1 and Figure 1-1 are: DT-1 for the Kiesel property (formerly known as Archer Daniels Midland and originally as PVO Foods); DT-2 for the City of St. Louis

and Western Railroad); DT-8 for PSC Metals Inc. property (also known as Philip Metals and formerly known as McKinley Iron Works); DT-9 for the Terminal Railroad Association property; DT-10 for the Thomas and Proetz Lumber property; DT-11 for the Venice, Illinois Property (formerly known as McKinley Bridge or City of Venice); and DT-12 for the Burlington Northern Santa Fe Railroad property (formerly known as the Chicago, Burlington and Quincy Railroad).

7. The boundaries of the SLDS as indicated in Figure 1-3 of the SLDS ROD are in some cases more restrictive than the broader ownership designations contained in the text, and in other cases, descriptive of lands under ownership not described in the text of Paragraph 1.1 or Figure 1-1. That particular figure denotes the boundaries as the Mississippi River on the east; south side of Angelrodt Street on the south; southern portion of the McKinley Bridge on the north; and eastern portion of Broadway Street on the west. Figure 1-3 also denotes the additional city block bounding "Plant No. 4," consisting of Broadway on the east; Mallinckrodt Street on the south; Ninth Street on the west and Salisbury Street on the north as being within the boundary of SLDS. Property ownership within the area of SLDS as shown in Figure 1-3 that were not individually listed in Paragraph 1.1 or Figure 1-1 include the Westerheide Tobacco Store (DT-32); the UAAA Local 1887 (DT-26); and a portion of the City of Venice property (DT-11).

8. The SLDS ROD defines "the final remedial action for accessible soils at and ground water beneath the SLDS for MED/AEC-related hazardous substances". Accessible soils are defined as "soils that are not beneath buildings or other permanent structures" while inaccessible soils are contaminated soil that is currently inaccessible due to the presence of buildings, active rail lines, roadways, the levee, and other permanent structures. These inaccessible soils, as well as contaminated soils beneath Buildings 25 and 101 on the Mallinckrodt Property, will be addressed as part of a separate CERCLA action for the inaccessible soil operable unit (ISOU). Accordingly, although three railroad properties are specifically included in the SLDS ROD as vicinity properties, contaminated soils located under active rail lines on these "Railroad Properties" are inaccessible and will be addressed as part of the ISOU. Further, the SLDS ROD specifically includes the "Remediated Levee Property" east of the levee but excludes contamination present beneath the existing levee, which will be addressed as part of the future ISOU.

#### NON-SIGNIFICANT CHANGES

9. Scope Change: The boundaries of the SLDS are clarified and amended to increase the geographical area/scope of the SLDS site to include additional area to the north, south and west of the site as it is defined in Figure 1-3 of the SLDS ROD. The SLDS is adjusted such that it is bounded on the south by Dock Street, on the west by Ninth Street and on the north by Bremen Avenue. The Terminal Railroad Association soil spoils area located south of Dock Street and bounded by Branch Street on the north, North Market Street on the south, Produce Row and a line continuing to the north to Branch Street on the west and Grossman Iron and Strategic Materials Companies on the east is also included in the amended geographical area of the SLDS. Two properties, the southern Lange-Stegmann Vicinity Property (DT-37) and the Terminal Railroad Association

the SLDS. These two properties are located within an area bounded by the western property line of the Terminal Railroad Association properties bordering Hall Street to the west, the Terminal Railroad Association property line to the north, and Bremen Avenue to the south. The SLDS remains bounded by the Mississippi River to the east. Properties included in the SLDS are listed in Table 1 and shown on Figure 1 "St. Louis Downtown Site (SLDS) Site Map" dated 3/11/05.

10. This change is effected primarily to reflect the areas either imprecisely described as within the original SLDS area, or that were subjected to final status surveys as a result of the ROD requirement that such surveys be compatible with the provisions of the Multi-Agency Radiation Site Survey and Investigation Manual (MARSSIM). Most of the additional properties investigated and included within the scope of the SLDS ROD were not found to contain MED/AEC-related contamination. Additional properties or portions thereof that require remediation include Gunther Salt (DT-4), Heintz Steel (DT-6), Midwest Waste (DT-7), PSC Metals (DT-8); City of Venice (DT-11); and Midtown Garage (DT-29) (IT, 2001a, 2001b, 2001c). The total volumes of contaminated soils on these properties are 1720, 1660, 3910, 7990, 2830 and 50 in-situ cubic yards, respectively. This totals about 18160 cubic yards, and includes 5270 cubic yards that is estimated for the southern portion of PSC Metals (DT-8) that was explicitly included in the ROD. This equates to a net increase in volume of about 12890 cubic yards.

11. The scope of SLDS is therefore amended to include the Mallinckrodt Property and all the VPs listed in Table 1. Figure 1, "St. Louis Downtown Site (SLDS) Site Map" dated 3/11/05, visually reflects the amended SLDS boundaries.

12. Performance Change: There are no changes to the performance of the remedial actions selected in the SLDS ROD.

13. Cost Change: The remedy selected in the SLDS ROD included excavation of approximately 85000 cubic yards (65000 cubic meters) of in-situ contaminated accessible soil at SLDS (USACE, 1998). The change in volume is limited to about 15 percent of the original projected volume. The increase in estimated remediation volume equates to an increased cost of approximately \$17 million. The total 30-year cost of the selected remedy as presented in Section 9 of the SLDS ROD was estimated to be \$114 million. Pursuant to CERCLA guidance, this cost estimate is expected to provide an accuracy of +50 percent to -30 percent (EPA, 2000). The excavation of this increased volume will not, therefore, materially affect the projected range of the SLDS ROD estimate. These changes in the volume and costs are within the range of errors provided for in CERCLA and do not alter the overall approach that was selected in the SLDS ROD.

14. The addition of the properties to the scope of the SLDS ROD, as indicated herein, represents a small increase in the physical area requiring remediation and a minor change to the estimated remediation volumes and the corresponding project costs. Consistent with the EPA guidance, minor refinements of volume and cost estimates during the RD/RA process are not considered significant differences (EPA, 1999). There are no changes to the performance of the remedial action, other than the addition of the area

Significant Differences (ESD) is not required, and an NSC is appropriate, because the revised remedy does not significantly alter the scope of the remedial action, the performance of the remedial action or the cost of the remedy as presented in the SLDS ROD.

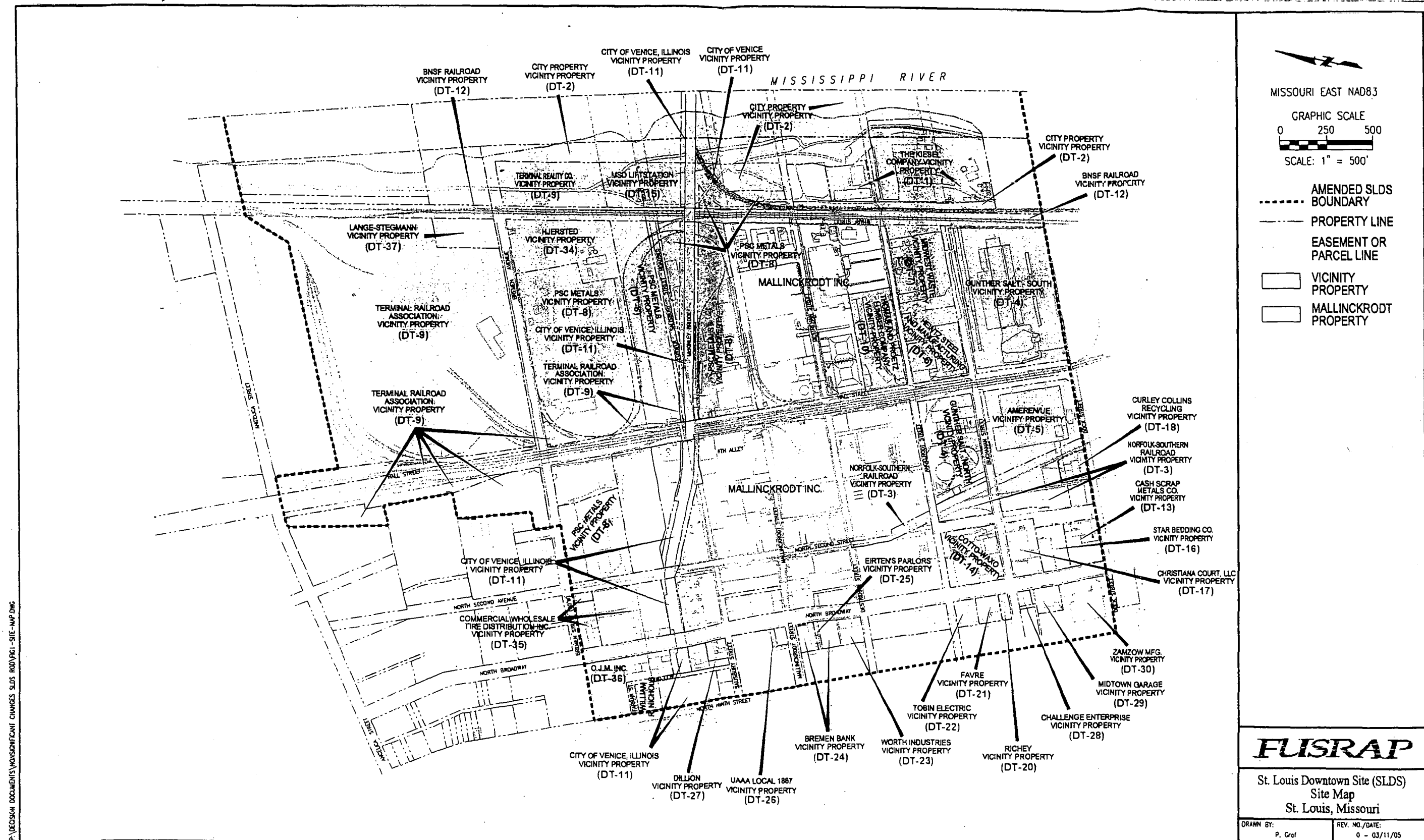
15. This memorandum will be included in the post-decision document file to provide a record of these non-significant changes to the final remedy for SLDS accessible soil.

2 Encls

1. Table 1. St. Louis Downtown  
Site Properties (Updated)
2. Figure 1. St. Louis Downtown  
Site (SLDS) Site Map

SHARON R. COTNER  
FUSRAP Program Manager

Current Property Owner	ID	Current Property Owner	ID
Mallinckrodt, Inc.	N/A	City Streets	DT-19
Kiescl (Formerly Archer Daniels Midland and PVO Foods)	DT-1	Richey	DT-20
St Louis City Properties	DT-2	Favre	DT-21
Norfolk Southern Railroad (Formerly Norfolk and Western Railroad)	DT-3	Tobin Electric	DT-22
Gunther Salt	DT-4	InterChem	DT-23
AmerenUE	DT-5	Bremen Bank	DT-24
Heintz Steel & Manufacturing	DT-6	Eirten's Parlors (a.k.a. O.T. Hodges)	DT-25
Midwest Waste	DT-7	UAAA Local 1887	DT-26
PSC Metals, Inc. (Formerly McKinley Iron Works)	DT-8	Dillon	DT-27
Terminal Railroad Association	DT-9	Challenge Enterprise	DT-28
Thomas & Proetz Lumber Company	DT-10	Midtown Garage	DT-29
City of Venice, Illinois (Formerly McKinley Bridge)	DT-11	ZamZow Manufacturing	DT-30
Burlington-Northern Santa Fe Railroad (Formerly Chicago, Burlington, and Quincy Railroad)	DT-12	Porter Poultry	DT-31
Cash's Scrap Metal	DT-13	Westerheide Tobacco Store	DT-32
Cotto-Waxo Company	DT-14	MoDOT	DT-33
City Properties (MSD Lift Station)	DT-15	Hjersted	DT-34
Star Bedding Company	DT-16	Factory Tire Outlet	DT-35
Christiana Court, LLC	DT-17	OJM, Inc.	DT-36
Curley Collins Recycling	DT-18	Lange-Stegmann	DT-37



# FUSRAP Document Management System

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Further Info?

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Mallinckrodt

Area

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