Leonard L. Griggs, Jr., P.E.
Director

LAMBERT-ST. LOUIS INTERNATIONAL AIRPORT

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Francis G. Slay
Mayor
City of St. Louis

July 9, 2003

Ms. Sharon Cotner
FUSRAP Program Manager
St. Louis District Corps of Engineers
FUSRAP Project Office
8945 Latty Avenue
Berkeley, MO 63134

Dear Ms. Cotner,

In response to your letter of April 30, 2003, requesting review and comment for the documents, *St. Louis North County Site Feasibility Study* and the *St. Louis North County Proposed Plan dated May 1, 2003*, I am enclosing comment from the City of St. Louis Airport Authority.

I would like to thank you for the opportunity to participate in the document review prior to selected site alternative implementation. If you have any questions concerning the enclosed comments please feel free to contact Mr. Mal Donohue of my staff at (314) 426-8146.

Respectfully,

Gerard Slay, Deputy Director STLAA

Enclosure: as stated

CC: Jan Titus, STLAA
Mal Donohue, STLAA

City of St. Louis Airport Authority Review and Comment Concerning the "FEASIBILITY STUDY FOR THE ST. LOUIS NORTH COUNTY SITE", prepared by U.S. Army Corps of Engineers, St. Louis District Office, Formerly Utilized Sites Remedial action Program, May 1, 2003

ITEM	LOCATION	COMMENT
General		The FS adequately addresses source removal options for accessible radiological contamination in soil at SLAPS.
General		The FS does not address groundwater due to classification of the uppermost aquifer as a Class III. The classification was made primarily on the insufficient groundwater yield criterion. Many of the following comments address potential environmental concerns and risks related to contaminated groundwater and reasonable expected future use of the SLAPS property, rather than reasonable expected future use of groundwater.
General		Throughout the FS, it is presumed that only radiological and metals contamination resulted from uranium processing at SLDS. According to the PRELIMINARY PUBLIC HEALTH ASSESSMENT, ST. LOUIS AIRPORT, HAZELWOOD INTERIM STORAGE/FUTURA COATINGS COMPANY, ST. LOUIS, ST. LOUIS COUNTY, MISSOURI, CERCLIS NO. MOD980633176, unstabilized piles of waste consisted of "106,500 tons of raffinate, 10,200 tons of leached or unleached barium sulfate, 4,000 tons of dolomite and magnesium fluoride, 3,500 tons of scrap metal, 600 tons of U-containing sand and other contaminated materials in 2,400 drums, and 350 tons of miscellaneous wastes". The other contaminated materials in the drums and the miscellaneous wastes are unspecified. At similar uranium processing sites (Oak Ridge, Feral, Weldon Spring) non-radiological wastes have included VOCs. The absence of commingling of VOCs and radiological waste on the SLAPS property should not be used to discount the possibility that VOCs detected at SLAPS originated from SLDS uranium processing activities.
1	Exec Summary, , *Authority*, ¶3, 1st bullet (also pg.3, ¶1 of the Proposed Plan)	FFA definition includes all wastes associated with Uranium processing conducted at SLDS. Wastes other than metals and radiological constituents are associated with uranium processing. See comment 2.
2	Exec Summary, ,	Regarding no record of VOCs originating from SLDS: U-

	Nature and Extent, ¶3	processing facilities used acids, solvents, fuels, lubricants, and volatile extraction compounds. For example, Oak Ridge Site contaminants include, Acetone, 2 Butanone, Toluene, and Xylene; the Feral and Weldon Spring contaminants include acrolein, PAHs, tetrachloroethene, and trichloroethylene.
	ES-6, 2nd paragraph	Please note: The City of St. Louis Airport Authority implemented a de-icing solvent collection system in 1999 to address the runoff of glycol de-icing solution to the Cold Water Creek receiving stream. The Airport collects de-icing solutions applied to aircraft and diverts the effluent collected to the Bissell Point Waster Water Treatment Facility (MSD) for treatment prior to discharge.
3	Exec Summary, p.ES-9 through p.ES-14, *Summary of Risk*	Risk assessment does not address potential risks from the shallow groundwater. Construction in the SLAPS area (i.e. building foundations, basements, elevator shafts) could complete GW dermal exposure pathway to workers. Further, considering future construction scenarios, the potential completion of the inhalation pathway to workers and occupants in basements/lower levels from the groundwater component is not assessed.
4	Sect. 2.2.5.2, ¶4	FS states that refinements were made to the groundwater conceptual model that include changes in the lateral continuity of Unit 3M (the aquitard) across the site. The RI states that the 3M unit is laterally discontinuous, being absent in the eastern portion of the property. Are there additional lithologic data points (borings) available to support the lateral continuity to the east, inferred lithologic contact between units 3T and 3M (which were not used in the previous version of the model)? Were lithologic data used to generate the previous model discounted? The uranium analytical data from the annual environmental report for calendar year 2000 indicate two locations were above MCLs (30 ug/l) for Uranium in deep groundwater-bearing units. It was reported in the annual report for 2000 that at least one monitoring well location was over 250 ug/l uranium, suggesting there is some degree of communication between the upper and lower hydrostratigraphic units. Will the classification of the upper aquifer be changed to Class II if such communication is discovered at a later date (thereby requiring current and future site owners to address groundwater problems)?
5	Sect. 2.3, ¶3	FS states a records search from industrial facilities near HISS/Futura Coatings reveal existence RCRA waste. No

		records searches for waste sources for the SLAPS area are mentioned which explain that the presence of TCE is unrelated to uranium processing waste. Did wastes from generators other than uranium processing facilities have access to the site?
6	Sect. 2.3, ¶4	Lack of detecting the commingling of wastes at SLAPS should not be used to exclude VOCs, which have been identified as contaminants at other U-processing sites. Lack of commingling may be due to segregation of the wastes (i.e. drums of liquid solvents) prior to burial and/or variabilities in contaminant mobility after waste container failure. Is there documentation that wastes from SLDS were only solids?
7	Sect. 2, Figs. 2-32 and 2-43	Electromagnetic anomalies in area 8 on Fig. 2-32 and in area H on Fig. 2-33 were attributed to "conductive material associated with soil stockpile". Were the anomalous responses possibly from buried material in the former dump in this location?
8	Sect. 2, Figs. 2-42 and 2-43	The figures show uranium and TCE groundwater concentrations two orders of magnitude greater than MCLs at locations within 100-ft. of Coldwater Creek. Historic drawings found in other documents depict site use during the 1950's. Drawings/photos from 1955 show drum storage along the western perimeter of the site. TCE was detected in groundwater in the southwestern quarter of the site. Was the site used for disposal of wastes from sites other than uranium processing during the 1950's?
9	Sect. 2.5.1	The "1999 Supplemental Human Health risk Evaluations" do not address risks associated with groundwater exposure. The current property owner should know the risk potentials for future property use. This is needed for evaluation of adequate institutional controls with respect to exposure to contaminated groundwater.
10	Sect. 4, Table 4-2	None of the listed Alternatives for SLAPS address groundwater, with the exception of groundwater monitoring during removal action. In order to protect human health and the interests of the property owners, institutional controls for any alternative should include zoning and deed restrictions. As stated in section 2.2.5.2 of the FS, concentrations of constituents in the uppermost groundwater-bearing unit are highly variable across the site. Restrictions should require analyses of groundwater and saturated soils at the point of invasive activity prior to activities such as construction of building foundations and installation of underground utilities. Analyses should include uranium, VOCs, and metals. RG's for the

		restriction should be risk-based for construction worker contact and future building resident exposures.

City of St. Louis Airport Authority Review and Comment Regarding the, "PROPOSED PLAN FOR THE ST. LOUIS NORTH COUNTY SITE", prepared by U.S. Army Corps of Engineers, St. Louis District Office, Formerly Utilized Sites Remedial action Program, May 1, 2003

ITEM	LOCATION	COMMENT
General		The selection of Alternative 5 (Excavate for release without restrictions) in Proposed Plan (PP) adequately addresses source removal for accessible radiological contamination in soil at SLAPS.
General		Alternative 5 has no provisions for environmental concerns and risks related to contaminated groundwater with respect to reasonable expected future use of the SLAPS property.
General		The STLAA's comments pertaining to groundwater in the review of the FS are also pertinent to the contents and conclusions of the PP.
1	Pg.3, ¶1 of the PP	FFA definition includes all wastes associated with Uranium processing conducted at SLDS. Is it known that wastes other than metals and radiological constituents are not associated with uranium processing? .
2	Pg 32, ¶1 of the PP	The proposed plan for SLAPS in selection of Alternative 5 is "Excavate for release without restrictions". The proposed institution controls for this alternative include restrictions to prevent exposure to contaminated soils left in place (inaccessible). Concentrations of constituents in the uppermost groundwater are highly variable across the site. In order to protect human health and the interests of the property owners, restrictions for this alternative should include analysis of groundwater at the point of invasive activity prior to activities such as construction of building foundations and installation of underground utilities. Analyses should include uranium, VOCs, and metals. RG's for the restriction should be risk-based for construction worker contact and future building resident exposure scenarios. See comment 3.

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Include in which AR(s)?

- ☑ North County
- ☐ Madison
- ☐ Downtown
- ☐ Iowa

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