LACLEDE GAS COMPANY 3950 FOREST PARK AVENUE ST. LOUIS, MISSOURI 63108



May 30, 2003

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

Re: Comment on the "North County Site Feasibility and Study and Proposed Plan"

Dear Ms. Cotner:

Laclede Gas Company (Laclede) is the natural gas distribution utility serving North St. Louis County. Laclede would like to comment on the alternative's presented as control options for the North County FUSRAP Site. Laclede's position is to support Alternative 5, "Excavation with Institutional Controls under Roads, Bridges, Railroads, and Other Permanent Structures". Based on the necessity to maintain natural gas utility facilities that presently exist below roadways in the North County FUSRAP site, it is essential that as much residual contamination as possible be removed so that this material will not hinder Laclede's ability to serve its customers and respond to emergencies.

In addition to the nuances of Alternative 5, we request that you to consider and continue to support the following initiatives:

- 1. There should be a provision for areas that have been declared "inaccessible", that,in the event they become "accessible", the full support of the Corps and with it, the notification, handling and disposal procedures as are currently offered for the "North County Site" be extended to these additional areas.
- 2. That these areas be included in the establishment of the long-term stewardship program that is to be co-managed by the Department of Energy (DOE) and The Corps of Engineers.
- That the Utility Support Agreement continue to be honored through the stewardship
 plan and function as it does now, with the notification process and the technical
 support (contractor) resulting in a report of the exposures during work activities in the
 "North County Site"."

If you would have any questions, please call me at 314-658-5557.

Wm. T. Fitzgerald

Manager, Environmental Hygiene

cc. G. R. Dowdy

C. R. Hoeferlin

R. A. Kottemann

P. A. Seamands

D. J. Wrobel

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