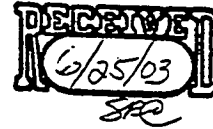


MISSOURI COALITION FOR THE ENVIRONMENT

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June 23, 2003



Ms. Sharon Cotner
FUSRAP Program Manager
US Army Corps of Engineers – St. Louis District
8945 Latty Ave.
St. Louis, MO 63134

Re: St. Louis North County Site

Dear Ms. Cotner:

The Missouri Coalition for the Environment urges the Corps of Engineers to seek jurisdiction over the areas at the West Lake Landfill at which radioactive wastes were illegally dumped in 1973, and then to remediate those areas as soon as possible. West Lake is located next to Earth City, in Bridgeton.

The Coalition has looked at the alternatives for the cleanup of the St. Louis North County Site in the "Proposed Plan" and "Feasibility Study," and urges the Corps to select Alternative 6 as its preferred alternative.

The radioactive wastes at the North County sites are located in the worst possible places for such toxic materials --- in the middle of a large metropolitan area and in or near water. Although the Corps continues to make progress toward the cleanup of the St. Louis Airport Site, Latty Avenue, and vicinity properties, we believe the North County remediation should also include the radioactive wastes at West Lake Landfill and a more extensive cleanup of the Coldwater Creek sediments and banks.

1. West Lake Landfill

The radioactive wastes at West Lake Landfill are portions of the same waste stream that was created during the processing of uranium for nuclear weapons at the Mallinckrodt Chemical Works near Downtown St. Louis, in the 1940s and 1950s; that were subsequently dumped at the St. Louis Airport Site and at Latty Avenue in Hazelwood; and that were dispersed along haul routes and onto vicinity properties.

It seems reasonable that the same federal agency should therefore have jurisdiction over the wastes at West Lake and should, as a part of the North County Site cleanup project, exhume and transport them to the same licensed storage facilities in Utah and Idaho to which the wastes from the other St. Louis sites are being transported.

While we realize that the U.S. Environmental Protection Agency currently has jurisdiction over West Lake Landfill, we believe it would be more efficient, expedient, and economical if the Corps were to be given authority to clean up the two radioactively contaminated areas at West Lake, rather than have the EPA defer the exhumation, transport and disposal of these hazardous materials, perhaps indefinitely. It seems more reasonable for the Corps to contract for the remediation of all the St. Louis Mallinckrodt wastes at the same time, including those at West Lake.

According to a 1982 radiological survey prepared for the Nuclear Regulatory Commission, samples of the soils collected at West Lake showed alarming levels of thorium-230 and radium-226, and of uranium-238 and other U-238 daughter products. (NUREG/CR-2722) These long-lived radiotoxins will emit radioactive rays and particles virtually forever. Unless they are removed from their present locations at West Lake in the Missouri River floodplain, they will continue to migrate within and beyond the floodplain.

2. Coldwater Creek

Because the wastes at both the Airport Site and Latty Avenue have impacted upon Coldwater Creek for decades — and have migrated into and beyond the sites' groundwater and surface water, the creek sediment and banks contain levels of radioactivity that exceed the Corps' current permissible standards. And the creek water itself continues to pick up and disperse radioactive particles and solutes. We are concerned about the proposal to clean up the creek only above the "mean water gradient." Children will always be attracted to the creek, and periodic flooding will continue to cause the dispersal of the contaminants — at heights above and below the mean water gradient. The creek empties into the Missouri River just upstream from the major St. Louis City drinking water intake.

We believe the entire gabion wall along the western boundary of the Airport Site should be removed and transported to one of the licensed radioactive waste disposal sites used by the Corps. As long as the contaminated wall remains along the shore of Coldwater Creek, it will continue to contaminate the creek. Conceivably, the Corps could try to wash the radioactive contaminants from between the rocks of the gabion wall (that is, the sludges that have been caught within the chicken wire baskets, starting in 1985 when the wall was installed). But the resulting rinse water would then have to be run through a multi-staged water treatment plant before it could be released to the environment. It would be safer for the wall to be removed once the Airport Site remediation has been completed, and for a new gabion wall or other retaining wall to be installed.

3. Alternative 6


The following quote from the Corps of Engineers' "Proposed Plan for the St. Louis North County Site" (May 2003, page 30) expresses the goals the Coalition thinks are the most appropriate to protect human health and the environment: "Alternative 6 would provide the highest long-term effectiveness and permanence because all of the radiologically contaminated

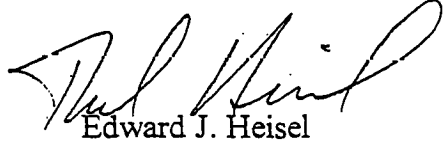
materials would be recycled or sent to permanent off-site disposal." (We do not, however, approve of "recycling" these wastes.)

The description of Alternative 6 sounds appropriate to us, and final: "Alternative 6 emphasizes excavation of all contaminated material, regardless of location or accessibility. All soils exceeding the RG [remediation goal] for unrestricted land use would be removed for all property units and disposed off-site. Unlike other alternatives roads, bridges, railroads, and other permanent structures would be removed as required to allow excavation of soils that exceed the unrestricted use criteria." (pp. 26-27)

We appreciate the efforts the Corps of Engineers has taken to try to clean up the historic nuclear weapons wastes that have been dispersed in many areas of St. Louis City and County. We hope you will choose the most inclusive and technologically responsible remedies for the completion of this massive undertaking.

Very truly yours,


Bea Covington
Executive Director


Edward J. Heisel
Senior Law & Policy Coordinator