

STATE OF MISSOURI      Bob Holden, Governor • Stephen M. Mahfood, Director  
**DEPARTMENT OF NATURAL RESOURCES**

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www.dnr.state.mo.us

November 4, 2002

Mr. Paul Bowman  
First Management Group, Inc.  
3201 New Mexico Ave, N.W.  
Washington, D.C. 20016

RE:    Roof Replacement at 9150 Latty Ave in Hazelwood, Missouri

Dear Sir,

Our information indicates you currently represent the owners of a parcel of property, located at 9150 Latty Avenue, in Hazelwood, MO. GIFRHEC is the current owner of record of this property. We are contacting you in regards to this property for the reasons noted below.

The Missouri Department of Natural Resources is responsible for oversight of the removal of contaminants generated by the Manhattan Engineering District/Atomic Energy Commission at various properties within St. Louis and North St. Louis County. It has been established that these contaminants exist within roofing materials on buildings located at the aforementioned address. In addition to this letter, we have attached field reports completed by our staff during site visits to this location.

The attached reports note the contractor has spilled debris and dust, which has potential for being radioactively contaminated onto the ground (instead of into the dumpsters). Also, the roofing contractors have the rooftop work areas set up in such a manner that allows laborers to walk through areas where potentially contaminated dust and debris have been spilled, after removing protective shoe covers. This type of work practice increases the chance of spreading contamination and has continued throughout the duration of the project, despite repeated warnings by both the state and the United States Army Corps of Engineers (USACE). Please refer to the attached field reports completed by our staff during site visits to this location.

The USACE is providing assistance to the roofing contractor for the radiological contamination. Having inquired of the USACE, regarding radioactive contamination resulting from the rooftop replacement activities, it has been found that field instruments used for testing these areas have not detected radiological activity exceeding background levels. Although the contractor responds to comments on spillage by picking up debris

*Integrity and excellence in all we do*

*Colman Dell'Arcio*  
*M. Mahfood*

Mr. Paul Bowman  
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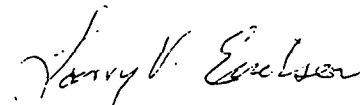
and securing misplaced trash chutes, not all of the contaminants of concern are readily detectable by field instruments. Therefore, merely picking up debris does not remove the potentially contaminated dust and other fine materials from the roof that has fallen onto the gravel around the building and at the ends of the roof downspouts.

This letter is being written to inform you that the removal practices demonstrated throughout this roof replacement are conducive to the spread of contamination. As noted below, a copy of this letter is being provided to various programs within the department, as well as the United States Environmental Protection Agency, the USACE, and the tenants.

If you wish to seek guidance regarding varying types of radiological impacts you may direct inquiries to Ms. Sharon Cotner, USACE, at (314) 260-3905. If you have questions regarding this letter, please contact Eric Gilstrap of my staff at (314) 877-3250, or in writing to 917 N. Highway 67, Suite 104, Florissant, MO. 63031.

Sincerely,

HAZARDOUS WASTE PROGRAM



Larry Erickson, P.E., Unit Chief  
Federal Facilities Section

c: Mr. Mohamad Alhalbi, SLRO  
Mr. Ric Cavanagh, St. Louis County Oversight Committee Chairman  
Mr. Shawn Kelly, Smurfit-Stone Container  
Ms. Jacque Mattingly, USACE  
Mr. Lou Dell'Orco, USACE  
Mr. Philip Schroeder, WPCP  
Mr. Tom Siegel, P.E., SLRO  
Mr. Dan Wall, U.S. Environmental Protection Agency  
Mr. Michael Zlatic, P.E., St. Louis County Department of Health

Attachments: Field Reports dated October 21 and 22, 2002.  
Photographs.

9150 Latty Avenue  
Roof Replacement Photographs



Photo 1.

This photo was taken on May 22, 2002. It should be noted the spillage of potentially contaminated material shown in this photo is not typical. Usually, the debris and dust that fell outside the dumpster was in much smaller pieces.

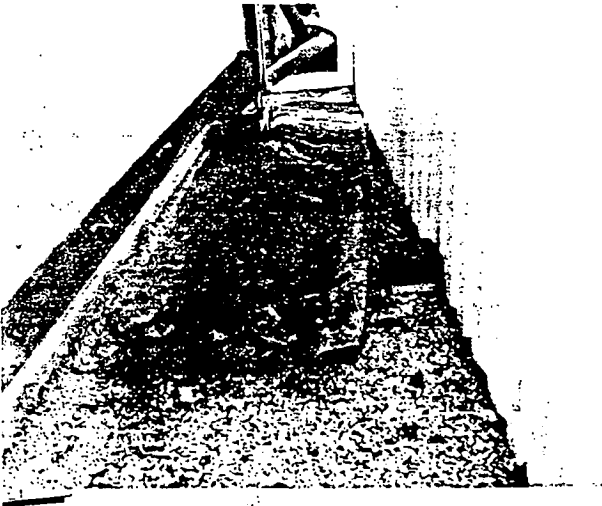


Photo 2:

Taken on October 22, 2002. The amount of spillage and use of a ground cover is a big improvement from the previous picture. However, the cover doesn't capture all the debris.

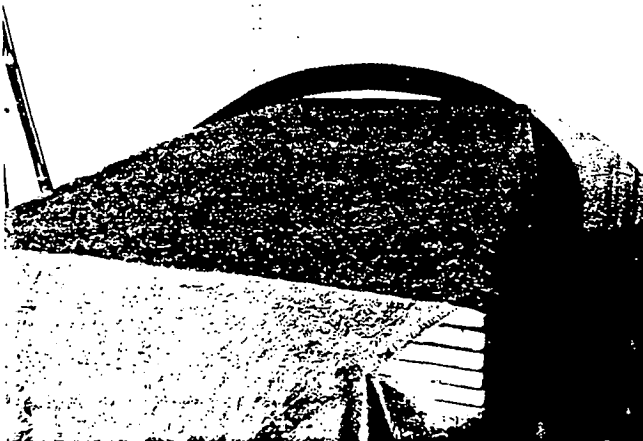


Photo 3:

Taken on October 22, 2002. The smooth surface of this tarp provides a good contrast showing the potentially radioactively contaminated dust that came off the roof. This is located approximately 8' away from the dumpster. The fine dust may become commingled with the surrounding gravel, and thereby get carried away by the wind and/or rain.



Photo 4:

Taken on April 15, 2002. The carts used to haul the contaminated roofing materials to the roof edge are prone to spillage. This is not a big concern as long as the debris and dust does not become windborne and is only spilled on areas to be removed or cleaned up.



Photo 5:

Taken on Oct. 22, 2002. The areas of the roof that are used to cart the contaminated debris is not roped off and distinguished as being radioactively contaminated. The workers wear protective shoe covers while tearing off the old roofing material. However, workers and visitors must walk across the cart transportation area (that is contaminated) in order to exit the roof. This practice causes a potential

# FUSRAP Document Management System

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Further Info?  
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North County

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latty

Area  
9150 Latty Avenue

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Remedial Investigation

Secondary Document Type  
Correspondence

## Subject or Title

Letter to inform that the removal practices demonstrated throughout this roof replacement are conducive to the spread of contamination.

Author/Originator  
Larry Erickson

Company  
MDNR

Date  
11/4/2002

Recipient (s)  
Paul Bowman

Company (-ies)  
First Management Group

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## Include in which AR(s)?

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