



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

DEC 17 1998

Ms. Sharon Cotner, Project Manager
Formerly Utilized Sites Remedial Action Project
Department of the Army
St. Louis District, Corps of Engineers
9170 Latty Avenue
Berkeley, Missouri 63134

Dear Ms. Cotner:

Re: FUSRAP St. Louis Sites Community Relations Plan
Revision 1, November 1998

Thank you for providing us an opportunity to look at the subject document. Based on a brief review, it appears to be a thorough and useful plan; however, we did make note of the following:

General comment - The plan incorporates the Madison Site. This is not inappropriate; however, the plan does not make clear that this site is located in a different EPA region, has different site contacts within EPA and the state, is not a subject of our Federal Facility Agreement, etc.

Section 1.2, pg. 1-1 - Actually, the Superfund law is considered to be CERCLA, as amended by SARA. Also, reference to CERCLA is commonly understood to mean CERCLA, as amended by SARA.

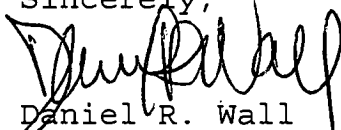
Section 2.1, pg. 2-1 - The operable unit breakdown described here is not consistent with our understanding, and probably reflects a misuse of the term "operable unit". The designation of an "operable unit" has a specific administrative meaning and function, each requiring development of a separate CERCLA remedial action decision. Although the strategy may evolve over time, we have so far identified two operable units relative to

the Missouri sites: OU 1 - the North County sites, and OU 2 - the St. Louis Downtown Site (SLDS). In future, if convenient to do so, we may identify other operable units, e.g., Coldwater Creek, or groundwater.

Figure 2.1, pg. 2-2 - An Engineering Evaluation/Cost Analysis (EE/CA) is actually part of the removal action decision process and is not a prerequisite of the RI/FS remedial action process as indicated in this figure.

Please call me at (913) 551-7710, if you have any questions.

Sincerely,



Daniel R. Wall
Federal Facilities Branch
Superfund Division

cc: Larry Erickson, MDNR

Cataloging Form

{Technical/Project Managers fill in C through G, K through Q. RM completes other fields}

A. Document ID Number: Assigned by database 00-416

B. Further Information Required?: ☐

C. Operable Unit (Choose One):

USACE ☐
St. Louis Sites ☒
Downtown ☐
North County ☐
Madison Sites ☐
Inaccessible Areas ☐
PRP ☐
Oversight Committee ☐

D. Site (Optional):

SLDS VPs ☐
Mallinckrodt ☐
SLAPS ☐
SLAPS VPs ☐
CWC ☐
HISS ☐
~~Madison~~ ☒

E. Area (Optional): _____

F. Primary Document Type (Choose One):

Site Management Records ☐
Removal Response ☐
Remedial Investigation ☐
Feasibility Study ☐
Record of Decision ☐
Remedial Design ☐

Remedial Action ☐
Public Affairs/Community Relations ☒
Congressional Relations ☐
Freedom of Information Act ☐
Real Estate ☐
Project Management ☐

G. Secondary Document Type (see back of form): Response to Comments Correspondence

H. Bechtel Number: _____

I. SAIC Number: _____

J. MARKS Number(Choose One): FN: 1110-1-8100e ☐ FN: 1110-1-8100f ☐ FN: 1110-1-8100g ☒

K. Subject/Title: EPA's Comments on the 1998 Community Relations Plan

L. Author: Dan Wall

M. Author's Company: EPA

N. Recipient(s): Sharon R Cotner

O. Recipient(s) Company: PMR

P. Version (Choose One): Draft ☐ Final ☒

Q. Date: Dec 17, 1998

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