County Water

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April 6, 1998

Dr. Rob Mullins, P.E., AICP
St. Louis District, Army Corps of Engineers
FUSRAP Project Office
9170 Latty Avenue
Berkeley, MO 63134

RE: Comments on the Hazelwood Interim Storage Site EE/CA Document (March 1998), and Comments on the St. Louis Airport Site EE/CA Document (March 1998)

Dear Dr. Mullins:

St. Louis County Water Company would like to make the following statements regarding the above noted public documents. We are in agreement with your noted recommendation and we support the Corps of Engineers' decision to clean the above noted sites to the 5 and 15 pCi/g standard. We believe that such level of cleanup is in the interest of the St. Louis community and, certainly in the interest of the field workers who would be under the employ of St. Louis County Water Company and might find themselves working in sites adjacent to the HISS and SLAPS areas. It is gratifying to see that the Corps of Engineers is completing the cleanup work as a final chapter to the work begun by your organization' s Manhattan Engineering District in the 1940's.

A further comment, however, needs to be made regarding your desire to reduce the amount of material hauled off-site by measuring and retaining that material that measures below the 15/15/50 pCi/g parameters. Your plan would have that material used as permanent backfill at SLAPS. This Company's concern stems from its experience with the measurement efforts that the Department of Energy, and later the Corps of Engineers had to undertake to provide this company with soil analyses which indicated what soils were safe for contact with our field workers in recent water main break events. It was our experience that multiple days were required to get a true reading of the alpha radiation levels of the soil samples which your staff removed and analyzed from our water main break sites. It was clear that the measurement was time consuming and we can only expect, was expensive. In discussions with your staff regarding the accuracy of such samples, it became clear that although the sampling was assumed to be representative of the larger quantity of material in question, that to actually measure enough soil samples to be certain that all of the soil encountered was indeed safe, many more samples would have had to have been taken and analyzed. In the soil sampling proposed, I must believe that the same limitations will apply. Due to time and dollar constraints, you will have to make generalizations regarding soil contamination levels, and these assumptions will not always be right.

The level of accuracy as well as the expense represented by such a procedure seems to be a poor alternative to the removal of all material to an off-site storage location. It is therefore our position that you should not rely on such sampling to guide your field people in determining which materials should to be left on-site versus what should be removed to out-of-state storage. Instead your proposed procedures should simply result in all excavated materials being removed to an off-site, out-of-state permanent storage facility.

I appreciate the time that you have taken in review these comments and look forward to a successful, final resolution of the Corps of Engineers clean-up effort.

Sincerely,

Donovan Larson
Manager, System Engineering

DL:mls