

April 6, 1998

Dr. R.L. Mullins, Jr., PE, AICP  
U.S. Army Corps of Engineers  
St. Louis District  
9170 Latty Avenue  
Berkeley, MO 63134

Subject: Comments on the Engineering Evaluation/Cost Analysis (EE/CA) for the  
St. Louis Airport Site (SLAPS)

Dear Dr. Mullins:

Mallinckrodt submits the following comments on the subject EE/CA.

Page ES-1, line 8. This sentence implies that separate processes were performed to extract radium from ore. Mallinckrodt does not believe this to be the case; the process objective was extraction of uranium from ores and concentrates. The generation of residues preferentially containing radium, if any, was likely an artifact of the uranium purification process, not a process objective.

Page 5-4, line 5. It is unclear whether expenditures by property owners and USACE associated with excavation, management, and disposal of contaminated soils in the future was included in the cost analysis. Such costs will be incurred during the construction, maintenance, and expansion of any facility constructed on the site.

Page C-4, line 4 It is unclear whether industrial worker exposures during excavations for maintenance and future construction and development of the property have been addressed. Such activities will be performed to support the maintenance and expansion of any facility constructed on the site.

Page C-12, Table C-4. The cleanup level stated for alternatives C2 and C3 is 50/100/150. This is inconsistent with page C-1, line 24 which indicates that the subsurface cleanup criteria for "C" alternatives is 15/15/50.

Please contact me at 314-654-6170 if you have any questions or require additional information.

Sincerely:



Robert F. Boland, PE  
Environmental Program Manager