May 7, 1999

Mr. Richard Cavanagh, Chairman, and Members St. Louis FUSRAP Oversight Committee 111 South Meramec Clayton, MO 63105

Dear Committee members:

This letter is in response to comments in the agenda packet and summary of the April 9 meeting of the Oversight Committee that relate to information I had received from a cleanup worker at the Airport Site and had then submitted to Jamie Allman of KMOV-TV, and to Bob Geller and Ron Kucera of the Missouri Department of Natural Resources (with copies to others).

## 1. Questions regarding the Agenda Packet:

-- page 9: "An individual within the [Airport] site took pictures and forwarded them to Kay who called Channel 4. Pictures showed nothing out of the ordinary."

My response: Because some of the water at this site is extremely contaminated, I do not believe that any of it should be released without treatment. Mr. Allman had borrowed the first three of the enclosed pictures. I do not believe the procedures used to clean up the contaminated water and soil are "ordinary," and the levels of radioactive contamination are not ordinary either.

Photo (1) was taken from the area excavated for a "sediment basin," at the western end of the site, near Coldwater Creek. A hose leads from the sed. basin, up over the berm, and into the ditch which flows along the southern boundary of the site and into the creek (to the north of the train tracks). A small two-inch pump is visible. It is my understanding that this water did not pass through the "water treatment apparatus" prior to being pumped into the creek.

Photo (2) shows the blue two-tank water treatment apparatus situated at the N.W. entry road to the site. An orange six-inch pump is at the right of the photo.

Photo (3) is the ditch that lies between the north fence of the site and McDonnell Blvd. The volume of water that results from runoff and rain shows that this is clearly a saturated site, and is at least in part a floodplain.

Photo (4) shows a culvert that runs under McDonnell Blvd. to a ditch across the road. A hose leads into the culvert. While some of the water in

the ditch along the site's northern fence is treated, not all of it is -- and the water in the ditch to the north of McDonnell Blvd. is not ever treated.

## 2. Questions regarding the Summary of the meeting:

- a. "Some hoses do bypass the water treatment apparatus, since water that is bypassed has already been treated." My response: I do not understand this sentence. Where has the water been treated that has bypassed the water treatment apparatus? Is there some <u>pre-treatment</u> treatment apparatus?!
- b. "There is no waste water going into the creek. The two tank system removes resins, not just sludges." My response: I had expected that the water treatment apparatus at the Airport Site would attempt to remove sludges and other solids from the contaminated water before releasing it into the creek. But compared with the water treatment plants installed at Weldon Spring -- where much of the pre-treated water has lower concentrations of radionuclides than the pre-treated Airport Site water -- the Airport Site filtering technology seems quite inferior.

I have long questioned whether the thorium at Weldon Spring is either accurately monitored or adequately filtered. And I have never accepted the Department of Energy's claims that the millions of gallons of treated water they are releasing into the Missouri River from Weldon Spring, nine miles upstream from our St. Louis drinking water intakes, are safe. The Weldon Spring water treatment plants, however, are undeniably more sophisticated than the one currently in place at the Airport Site and include such processes as ion exchange resins, activated carbon, activated alumina, and radon adsorbers. At Weldon Spring they are at least trying to capture <u>dissolved</u> contaminants as well as solid ones. I have been told that Stone & Webster, the general contractor that is scheduled to take over at the Airport Site on May 15, is expecting to install a more complex water treatment system. I certainly hope so.

c. "The site is constantly monitored and misted. Workers wear personnel monitors for which the 'trigger levels' are exceedingly low. Dust is contained at background levels (that is, naturally occurring levels)." My response: The Geiger counters and personnel dosimeters may register the workers' exposure to external gamma rays (assuming they are of acceptable quality), but I do not believe they are able to assess the concentrations of alpha-emitting dust and radon gas present in the air the workers have to inhale. Because of the high levels of thorium, radium and uranium in the Belgian Congo mill tailings and residues deposited at this site, it would seem that the workers should at <a href="Least">Least</a> be provided with paper cone masks if not with full-face respirators.

Although some containment of the dust may be achieved by occasional misting of the site, it is apparently not adequate according to the worker who contacted me. And he observed, as I have, that the site is extremely windy.

Two related concerns about the workers:

(1) I wonder if the bulldozers, excavators and other earth-moving equipment have air-conditioned, enclosed cabs so that the workers can be

protected during the summer from the radioactive dusts that are stirred up and circulated when the workers move their equipment and dig with it.

- (2) I also wonder about the accuracy of the personnel monitors. I understand the thermoluminescent dosimeters (TLDs) are not collected each night for safe keeping as they should be. I also understand that Radian International, the outgoing general contractor, sends the TLDs to its own laboratory in Oak Ridge for analysis -- hardly an independent assessment.
- d. "a hot spot was hit in the basin. Such events have been anticipated. Workers followed procedures that were well laid out." My response: I hope contingency plans are now in place, but it is my understanding they were not previously. I also believe there has been a lack of continuity among the staff of health physicists.
- e. "The frozen barrier issue: Bob Geller (MDNR) responded that the technology was not deemed necessary, especially since a frozen barrier can actually make matters worse from the freezing/thawing process." My response: Because the materials being exhumed from above, below, and within the water table are highly radioactive, I believe it would be worthwhile to invite a frozen soil barrier vendor to visit the site and assess the potential use of this technology. I believe this technology has been used in climates similar to ours, and if it could help reduce runoff and groundwater contamination, it would be prudent to consider it.

I remain grateful to the worker who chose to come forward with his concerns about the cleanup procedures at the Airport Site. I would expect you are also grateful. Unfortunately his need for anonymity should surprise no one.

As a citizen long concerned about our contaminated St. Louis sites, I also greatly appreciate the continuing oversight work of your committee.

Sincerely,

Kay

Enclosures: four photos

cc: Sharon Cotner and Lou Dell'Orco, U.S. Army Corps of Engineers
Messrs. Ron Kucera and Robert Geller, MO Dept. of Natural Resources



PHOTO



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