

ST. LOUIS FUSRAP OVERSIGHT COMMITTEE
c/o 111 So. Meramec
Clayton, MO 63105
314.854.6635

April 30, 1999

MEMORANDUM

TO: St. Louis FUSRAP Oversight Committee
Other Interested Parties

FROM: Richard R. Cavanagh, CHE *RC*

RE: Next Meeting

The next meeting of the St. Louis FUSRAP Oversight Committee will be Friday, May 14, 1999, 11:30 am, at the Trailers on Latty Ave.

Committee members who cannot attend should contact me in order to be excused.

Thank you.

:RRC

ST. LOUIS FUSRAP OVERSIGHT COMMITTEE

c/o 111 So. Meramec

Clayton, MO 63105

314.854.6635

Summary of April 9, 1999 Meeting

Committee Members Present: Krista Durlas, Jack Fraenhoffer, Anna Ginsberg, Ric Cavanagh, Tom Binz, Bill Brandes

Committee Members Excused: Sally Price, Donovan Larson

Other Interested Parties in Attendance: Bob Boland, William Jarbo, Eric Gilstrup, Bob Geller, Tom Horgan, Chris Byrne, David Wagoner, Virgil W. Jansen, Scot Miller

The following comments are in addition to the handouts provided by USACE (copies attached).

Page 4 - Call or write to Sharon Cotner if you did not receive a copy of the EE/CA. In response to Donovan Larson's question from last meeting, information on the volume of water discharged will be available in approximately 30 days.

Further discussion continued regarding the letter sent by Kay Drey to MDNR. In response to some of the issues she raised, USACE responded: 1) some hoses do by pass the water treatment apparatus, since water that is by passed has already been treated. There is no waste water going into the creek. The two tank system removes resins, not just sludges. 2) the site is constantly monitored and misted. Workers wear personal monitors for which the "trigger levels" are exceedingly low). 3) dust is contained at background levels (e.g. naturally occurring levels). 4) regarding the Geiger counter issue, a hot spot was hit in the basin. Such events have been anticipated. Workers followed procedures that were well laid out. Other concerns: the EE/CA only deals with pumping surface water, not groundwater. The latter will be addressed in the North County ROD. 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.

Bob Geller informally responded to some of the questions raised in the Drey letter. His formal letter of response is attached to this summary. Bob introduced Eric Gilstrap who is the newly appointed state staff person on staff who will be present full time in the future for monitoring purposes.

Page 5 - Bechtel is now totally off site. USACE is trying to purchase the microfilm files from Bechtel. The current SLAPS RA contractor is Stone and Webster.

Page 8 - the Disposal Contract really cannot be discussed since a contract award has not been made. Staff will be able to discuss this at the Committee's may meeting (since the contract

award should have been made by that time).

Additional Issues:

- Jack Fraunhoffer suggested that USACE and the Committee again do something at the statewide solid waste conference. Jack will get details and pursue.
- the 11 E 2 issue will be discussed at the May meeting. See attached copy of article from Post-Dispatch. (Anticipate a reported attending our next meeting).
- Funding - Congressman Talent's office has taken the lead in getting a bi-partisan letter sent supporting additional funding for St. Louis sites. Now the efforts must be focused on getting more funding for FY 2000

Next Meeting

Friday, May 14, 1999
11:30 am
Latty Avenue Trailers

April 6, 1999

Mr. Ron Kucera
Mr. Robert Geller
Missouri Department of Natural Resources

Dear Bob and Ron:

As you may have heard, a worker at the St. Louis Airport Site contacted me several weeks ago about the cleanup activities at the site and particularly about the release of contaminated surface- and ground-water directly into Coldwater Creek (and into ditches which lead into the creek). For example, some of the hoses have bypassed the "water treatment plant," a two-tank piece of equipment that may merely filter out the sludges.

The worker also expressed concerns about the fact that most of the workers are not being required to wear even paper cone masks (let alone a mask or respirator with supplied air) in spite of the fact that the site is often extremely windy and dusty. The dust, of course, can contain radioactive alpha-emitting uranium, thorium, radium, polonium, etc., and the extremely hazardous beta emitter, actinium-227. In addition, radon gas is being emitted.

And apparently the gamma levels surprise even the health physicists on site. One time, for example, the health physicist used three different Geiger counters successively because he couldn't believe the high readings -- and then told the workers to leave the area immediately.

I am enclosing a transcript of Jamie Allman's March 29 news segment on KMOV-Channel 4 for your information. I am writing to ask if you would please tell me if you agree with the role of the State of Missouri at the Airport Site cleanup, as described on the program, and specifically with respect to the following quotes?:

1. "Everything that is discharged off this site into Coldwater Creek is in compliance with our existing permit with the state of Missouri."
2. "They [cleanup officials] also say the filtering system is approved by the state."
3. "Now the state orders crews to test that water regularly."

Since I've been told by a knowledgeable worker at the site that the water is not all treated or tested before being released into the creek and ditches, I believe these claims of "nothing to worry about" seem unwarranted.

Although I donated my 19-year collection of files on the Airport Site, Latty Avenue, Downtown Mallinckrodt, and the vicinity sites to the University of Missouri-St. Louis library in October 1997, after resigning from the oversight committee, I remember one extraordinary reading taken of Airport Site groundwater: 8,679 picocuries per liter (collected in the northwest quadrant, near the creek). A 1981 Oak Ridge National Laboratory report gave the average

concentration of uranium in groundwater in Missouri as 0.71 pCi/L and 0.29 in our surface water.

Because the Belgian Congo pitchblende ores were notoriously rich in uranium, the Mallinckrodt ore tailings at the Airport Site are, too. Some of those tailings, later called the "Cotter concentrates," were first trucked to Latty Avenue and then ended up all over the place: West Lake Landfill next to Earth City, Colorado, Ohio, Nevada, and Idaho. But no one denies any longer that a lot of the uranium tailings and residues remain at the Airport!

Some members of the original oversight committee had suggested in 1997 that the Department of Energy consider using the FROZEN SOIL BARRIER technology during the exhumation of the Airport Site wastes. As I understand it, that technology calls for gas to be pumped into narrow, sub-surface metal pipes (shaped like the ribs of a canoe and installed under the buried wastes that are to be exhumed -- one area at a time). The gas is then refrigerated electrically, forming a barrier of frozen soil. The contaminated groundwater is thus contained during the exhumation. I'd been told the Corps of Engineers has used this technology in at least one floodplain elsewhere. Why not here, too?!

At the very least, I believe that none of the site water -- containing solid and dissolved radioactive wastes, as well as selenium and other hazardous chemicals -- should be permitted to flow directly into the creek or into the ditch "tributaries." It should all be tested and treated.

Sincerely,

Kay Dray

cc: ✓ Sharon Cotner and Lou Dell'Orco, U.S. Army Corps of Engineers
Richard Cavanagh, Chair, St. Louis FUSRAP Oversight Committee



CLIENT
PGM
STN
TIME
DATE

Kay Drey
News 4 St. Louis
KMOV-TV (CBS)
6:04 p.m.
03/29/99

ATTN Kay Drey

T/D
03/30/99

LARRY CONNERS (ANCHOR): In other news, a local environmental activist is questioning whether radioactive waste near Lambert airport is ending up in an important waterway.

JULIUS HUNTER (ANCHOR): Jamie Allman reports the woman is the reason the site is being cleaned up in the first place but *now* she's criticizing the work.

KAY DREY: This is the oldest radioactive waste of the atomic age.

JAMIE ALLMAN (REPORTER): And Kay Drey says the airport waste site is still the most dangerous despite two years of cleanup work. Her evidence--photographs taken by a cleanup worker and funneled to her.

DREY: He could get into a lot of trouble--he's not suppose to have done--he's not suppose to *talk* with me.

ALLMAN: Drey's main concern is Cold Water Creek that runs along side the site. The water here flows into the Missouri River and eventually into your drinking water. Drey says the pictures show lax cleanup efforts and small inadequate filtration systems that could be allowing radioactive waste to keep polluting the creek.

DREY: I can't imagine any creek more important than this creek as far as human beings are concerned.

ALLMAN: Back in the early 40s Mallinckrodt processed some of the richest uranium ore in the world--it came from the Belgium Congo. What was not sent off to make bombs was scrapped and dumped at the airport. The site is still considered very hot so water pulled from ditches is taken through a filtering system and then pumped back into the creek.

Cleanup officials admit low levels of radioactive contamination are still present in the water but not enough to hurt anyone.

LOU DELL'ORCO (CLEANUP COORDINATOR): They're not to be concerned about from the standpoint of protection of human health and the environment. Everything

that is discharged off this site into Cold Water Creek is in compliance with our existing permit with the state of Missouri.

ALLMAN: As for the pictures, cleanup officials say they show nothing more than routine drainage efforts. They also say the filtering system is approved by the state. Drey says she expected a more massive cleanup effort and she says no amount of contamination of Cold Water Creek is acceptable.

DREY: None of this water should go into the creek directly. I can't--it's so basic.

ALLMAN: Now the state orders crews to test that water regularly. The water company also tests your drinking water and so far no reports of contamination. The soil that is being pulled from the site is being shipped by train to Utah where it is dumped in that area.

We don't know when exactly this cleanup's going to be completely done with--right now they're excavating the site. It's a possibility that in a year or two it'll be back to whatever use the airport sees fit.

HUNTER: Okay, Jamie Allman reporting.

APR 26 1999

Mel Carnahan, Governor • Stephen M. Mahfood, Director



DEPARTMENT OF NATURAL RESOURCES ADMINISTRATION

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

April 19, 1999

Mrs. Kay Drey

Redacted - Privacy Act :

Dear Mrs. Drey:

Thank you for writing and bringing your concerns regarding the remediation efforts at the FUSRAP sites in St. Louis to my attention. In doing so, you asked whether I agreed with the role of the state of Missouri at the Airport Site cleanup as depicted on a KMOV news segment which aired March 29, 1999. I appreciate that you included a transcript with your letter, as I was unable to view the segment.

Mr. Dell'Orco of the United States Army Corps of Engineers (USACE) stated, "Everything that is discharged off this site into Coldwater Creek is in compliance with our existing permit with the state of Missouri." To clarify, the USACE does not have a "permit" from the State to discharge water from the St. Louis Airport Site (SLAPS). Because this site is on the National Priority List some permits may not be required. In this case, they do not have a National Pollutant Discharge Elimination System (NPDES) permit. However, our Water Pollution Control Program has issued a listing of the Applicable or Relevant and Appropriate Requirements (ARARs) which provides for effluent limitations. A copy of the requirements issued for the SLAPS is enclosed indicating the effluent limitations.

At this time, DNR cannot support the claim that the USACE is in compliance with these limits. Our field staff has asked on numerous occasions for this data as it relates to each of the discharges of water into the Coldwater Creek. It has not been provided. The first quarterly discharge monitoring report is due this month.

The reporter, Mr. Allman, stated that, "They [cleanup officials] also say the filtering system is approved by the state." Although the filtering system does not have to be approved by the state, we do have the authority to review and comment on the proposed system. The department has only recently received, and is reviewing, the operational and maintenance manual for the water treatment plant.

The final quote from Mr. Allman notes that, "Now the state orders crews to test that water regularly." The Missouri Department of Natural Resources (MDNR) has requested or required owners or operators to monitor the discharges from SLAPS for several years. The ARARs, mentioned above, provide for monitoring of discharges monthly or on a per event basis. Again the department has requested the sampling data both verbally and in writing on many occasions over the past three months. The department also plans to sample the Coldwater Creek downstream from the SLAPS.

Mrs. Kay Drey
April 19, 1999
Page two

You mentioned a concern regarding the dust generated at the site. The remediation plans submitted by the USACE indicate methods their contractors will implement to suppress dust during remedial activities. Minimizing fugitive dust is essential to minimizing offsite exposures. Their contractors will also conduct air monitoring to document worker exposure and if necessary make the appropriate changes to the personnel protective equipment. The specific requirements and monitoring for worker exposure are generally outside our authority.

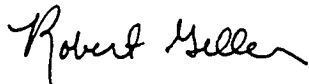
You also asked why frozen soil barrier technology was not being used at this site as it had on others. Although this technology has been used successfully on other sites for a variety of purposes, the Department of Energy felt it had limited benefit at the SLAPS. One of their main concerns is that the use of this technology can cause an increase in the mobility of any remaining contaminants if or when the soil is thawed. The soil expands when frozen, creating cracks. Upon thawing, these cracks then become pathways for the contamination to move vertically and horizontally through the soil. This would not benefit the site or the surrounding groundwater system.

MDNR will strive to provide effective oversight at the FUSRAP sites to insure that the remediation work is done in a manner that is protective of human health, the environment, and the citizens of Missouri. MDNR is preparing to open a FUSRAP field office to provide an increased level of oversight for the projects in St. Louis. This staff will be able to more readily address concerns related to these sites. I will forward the phone numbers, address, and names of on-site personnel once the office is open.

If you have any further questions or comments, please call me at (573) 751-3907. Thank you again for taking the time to write and express your concerns.

Sincerely,

HAZARDOUS WASTE PROGRAM



Robert Geller, Chief
Federal Facilities Section

RG:le

Enclosure

c: Dan Wall, EPA
Sharon Cotner, USACE
Richard Cavanaugh, St. Louis Oversight Committee
St. Louis Regional Office, MDNR
Water Pollution Control Program, 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 1012 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): 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: Oversight Committee Meeting Minutes from 4/9/99

L. Author: Richard Cavanagh

M. Author's Company: Oversight Committee

N. Recipient(s): _____

O. Recipient(s) Company: Distribution

P. Version (Choose One): Draft ☐

Final ☒

Q. Date: 4/30/99

R. Include in the ARF? ☒

S. Include in the AR? ☐

T. Filed as Confidential/Privileged? ☐

U. Document Format (Choose one):

Paper ☒
Electronic ☐

Photographic ☐
Audio-visual ☐

Cartographic/Oversize ☐
Microform ☐

V. Filed in AR Volume Number: _____

W. Physical Location (Choose One):

Central Files ☒
Records Holding Area ☐

Microfilm Vendor ☐
Department of Energy ☐

In ARF ☐
In AR ☐

X. Associated with Document(s): _____

Secondary Document Types

- ☐ Amendments to Record of Decision (ROD)
- ☐ Anomaly Review Board Documents (Management Plan, Correspondence, Standard Operating Procedures, Findings)
- ☐ Applicable or Relevant and Appropriate Requirements (ARAR) Determinations
- ☐ Archives Search Reports (ASR)
- ☐ Briefing Papers
- ☐ Chain of Custody Forms
- ☐ Community Relations Plan
- ☐ Correspondence
- ☐ Daily Operations Summary/Situation Reports
- ☐ Engineering Evaluation and Cost Analysis (EE/CA) Action Memo
- ☐ Engineering Evaluation and Cost Analysis (EE/CA) Approval Memorandum
- ☐ Engineering Evaluation and Cost Analysis (EE/CA)
- ☐ Explanation of Significant Differences
- ☐ Fact Sheets/Newsletters
- ☐ Feasibility Study (FS) Reports
- ☐ Federal, State, Local Tech. Records
- ☐ Final Approved Findings and Determinations
- ☐ Final Remedial Design Documents
- ☐ Freedom of Information (FOIA) Requests
- ☐ Freedom of Information (FOIA) Responses
- ☐ Health and Endangerment Assessments
- ☐ Interagency Agreements/Memoranda
- ☐ Interim Deliverables
- ☐ Inventory Project Report (INPR) Risk Assessment Code (RAC)
- ☐ Invoices/Contractor Payments/Cost Reports
- ☐ Land Grants/Deeds
- ☐ Mailing Lists
- ☐ News Clippings and Press Releases
- ☐ No Further Action Docs (NOFA)
- ☐ On-Scene Coordinator Reports
- ☐ Proposed Plans for Remedial Action
- ☐ Public Meeting Minutes/Transcripts
- ☐ Public Notices
- ☐ Public notices, Comments Received, Responses to the Comments
- ☐ Published Hearings
- ☐ Record of Decision (ROD)
- ☐ Reference Documents
- ☐ Remedial Action Documents
- ☐ Remedial Investigation (RI) Reports
- ☐ Removal Response Reports (Emergency Evacuation Orders)
- ☐ Rights of Entry Documents
- ☐ Sampling/Analysis Data and Plans
- ☐ Scopes of Work/Contractual Documents
- ☐ Site Descriptions and Chronologies
- ☐ Site Inspection Documents
- ☐ Site Photographs and Maps
- ☐ Testimonies
- ☐ Title Search Documents
- ☐ Work Logs
- ☐ Work Plans and Progress Reports
- ☐ Work Plans/Site Safety and Health Plans and Progress Reports
- ☐ Work Register and Logs