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Sandy Delcoure Alf Stole Byron Clemens Fran Sontag Kay Drey Rebecca Wright Sally Price Pamela Todorovich Donovan Larson Jim Werner Leon Steinbach Daniel McKeel Kathleen Logan Smith John Bunn Rick halmonicy



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1 IIVE Rear the SLAPS SITE. HOW MUCH EFFORT HAS BEEN MADE TO TEST SOIL, WATER ETC WEST OF LINDERSH?

How much impact does this SLAPS SITE impact The HEANTH ISSUES Now AND 'SINCE 1940'S. IS THERE AN EMPIRICAL STUDY (STUDIES) CONCERDING THE HEALTH ISSUES ASSOCIATED W) Dordia tion # IN ATTS ANEA? WHAT AND THE HEALTH ISSUES ANTAS IDENTIGED AS HOT SITES BESIDES THE SLAPS SATE IN HARZELIADD?

SLAPS SITE IMPART THE TAX ASSESSONS OFFICE? WHEN COMPUTING THE Property TAX NATURATION ?

WHAT IMPACT DOES

Written Comments

Written comments and/or questions may be submitted at this Public Meeting or by mail to the following address:

St. Louis District, Corps of Engineers FUSRAP Project Office 8945 Latty Avenue Berkeley, MO 63134

If alternative 5 is chosen I an concerned obset continued contamination From soil under permanent strenetures. I am especially concerned about groundwater contamination.

I am also concerned about on going mistitutional controls on permanent structures. It rondo are Acpaired on keps up graded etc., will that create an exportanity to excavate impacted soil? I think that should be part of the ongoing I think that should be part of the ongoing institutional control. Otherwise I think institutional control. Otherwise I think institutional alternative 6 should be chosen. Alternative alternative 6 should be chosen. Thank you for consuderation of my

converto.

Caroline PuFALT Redacted - Privacy Act Redacted - Privacy Act

Comments to the Army Corps of Engineers Public Hearing for the Proposed Plan for the North County Site (May 29, 2003)

- by -

Daniel W. McKeel, Jr., M.D.

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(Oral remarks to be extended in writing)

the North county site, eleven <u>non-radionuclides</u> are identified as COCs (contaminants of concern) for soils: **antimony**, **arsenic**, **barium**, **cadmium**, **chromium**, **molybdenum**, **nickel**, **selenium**, **thallium**, <u>**uranium**</u>, and **vanadium**. These <u>noncarcinogens</u> have different effects on systems or organs in the body..."

• My first related comment is that <u>uranium-238 is definitely a</u> <u>radionuclide</u> with a half life of 4.47 billion years, in addition to its toxicity as a metal. Calling uranium a non-radionuclide must therefore be corrected.

• My second comment is that the listing of 11 COCs for soil as noncarcinogens is substantially incorrect. In fact, perusal of carcinogen listings for the named substances by EPA, ATSDR, National Toxicology registry and International Agency for Research in Cancer (IARC) reveals, rather, that 6 substances are established human carcinogens: ARSENIC, CADMIUM, NICKEL, HEXAVALENT CHROMIUM, URANIUM AND SELENIUM <u>SULFIDE</u>. The Plan does not state which forms of chromium and selenium are being referred to on page 18.

Listed as <u>NOT CLASSIFIED</u> because of insufficient human data with respect to carcinogenesis are **antimony**, **barium**, **molybdenum**, and **thallium**. However, ATSDR notes that antimony has produced <u>lung cancer in rats</u>. NOT CLASSIFIED is different from being classified as NOT CARCINOGENIC, since it means insufficient

Human Carcinogenicity Of Slaps North County Plan Of Eleven Non-Radionuclides Identified As COCs For Soils, page 18

COC, page 18	Carcinogen	CA compound/s	Agency
Arsenic	YES		
Cadmium	YES		
Nickel	YES (lung cancer)		NTP, IARC
Chromium	YES	N6 (hexavalent)	
Uranium ¹	YES, plus nephritis	U-238 metal	EPA
Selenium	YES, 1 compound NOT CLASSIFIED "Although some early studies with rats suggested that some selenium compounds might cause cancer"	 Selenium sulfide Other selenium compounds than sulfide 	EPA IARC -
Antimony	NOT CLASSIFIED "Lung cancer has been observed in some studies of rats that breathed high levels of antimony."	"How likely is antimony to cause cancer? No human studies are available. We don't know whether antimony will cause cancer in people"	DHSS, EPA, IARC, ATSDR (3cc col. 3)
Barium	NOT CLASSIFIED "Barium has not been classified because there are no studies in people and the two available animal studies were inadequate to determine whether or not barium causes cancer."		DHSS, EPA, IARC ATSDR (see col.2)

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Comments to U.S. Army Corps of Engineers

From Fran Sontag,

Redacted - Privacy Act

Let me say at the outset that the clean-up of the contaminated sites which has already been done is greatly appreciated. Your interest in continuing to do a good job is evidenced by this meeting.

However, I have some concerns which still need to be addressed. My concerns involve answering the question of 'How Clean is "Clean"?' Since these sites are in highly populated urban areas and since the way we answer that question will affect our children and grandchildren for hundreds or thousands of centuries, I feel strongly that we should go for the cleanest "clean" which is possible. And I choose the word possible rather than feasible because I do not think we should take the easy route in a matter which will have consequences which last longer and are more serious than we may like to imagine.

A big problem factor is that Coldwater Creek runs through the area. During and after a flood, sediment is spread over a wide area outside the creek banks. Then after the waters subside this contaminated soil would naturally tend to erode and blow about over an even wider area. Then the next flood and drought cycle would spread the dangerous stuff more and so on and so on—for a long, long time. So I hope you can see my logic of removing as much as humanly possible now while it is relatively close to where we can identify it and deal with it. Because this dust is not just any dust; it contains uranium and thorium and radium particles. These in turn eventually break down into radon gas . If this gas (or dust containing the above mentioned nuclear particles) is inhaled, it will give off radioactive particles and rays within one's body. These are especially damaging to children. I am a grandmother of nine and I have concerns for their future. And I have even more immediate concerns for those families living closer to these dangerous sites.

I would urge you to dig more deeply all along Coldwater Creek and its banks for quite some distance. When you finish that, remove the gabion wall (the rocks and chicken wire) which is there now and replace it with something more permanent which can be monitored for nuclear contamination regularly in the future.

I would also urge you to dig more deeply where the big piles of contaminated soil have already been removed. Surely some has already leached into the underlying soil.

One more thing—I have visited the site fairly recently and felt that it was very poorly marked. It is almost indistinguishable from the myriad of industrial sites so close by. Perhaps some larger, more colorful and clearer signs would give a better warning to the uninformed visitor.

I thank you for your consideration of my concerns. And one more time urge you to do the right thing and do a thorough job.

Shazion

my name is . Janky Delesure and I live on Call Mater Creek There is tremendous, uncreasin development along ? the creek that will a add to guture gloslen along the creek. Dust pediment deposited alo. the creeks banks from the rice and fall of th water con become airlione, que off radon gas and be inhall This is whight id important that Cold nater Creek le guen - 3/4

attention and be cleaned up where it is contaminated Cold nater Creek id an when stream with homes, schools, churches businesses and parks all along its banks. Children play along the creek's banks right up to the edg of the water, it would be very much appreciate if Cold Mater Creek were checked and mad page for the communite

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