

MAY 21 1999

Formerly Utilized Site
Remedial Action Program

Honorable James M. Talent
Representative in Congress
555 North New Ballas Road, Suite 315
St. Louis, Missouri 63141

Dear Mr. Talent:

The following is furnished in response to your faxed letter of May 14, 1999, regarding allegations related to release of contaminated water and exposure of on-site workers to contaminated dust at the cleanup of the St. Louis Airport Site (SLAPS). This site is being remediated by the U. S. Army Corps of Engineers under the Formerly Utilized Sites Remedial Action Program. At your request, I have investigated the allegations and have determined that the allegations are unfounded.

Regarding release of contaminated water, the Corps has altered the flow patterns of the site to ensure that all stormwater entering SLAPS is controlled, sampled and managed accordingly. Ditches which once were capable of carrying contaminated sediment away from the site have been plugged. Pooled water is sampled regularly. Water found to be above discharge criteria identified by the Missouri Department of Natural Resources (or Federal criteria for radionuclides) is then pumped to an on-site water treatment facility where contaminants are removed prior to discharge into Coldwater Creek. Water found to be below the discharge criteria is pumped into ditches which lead to Coldwater Creek. The existing water treatment system has been specifically designed for the on-site volume of stormwater, discharge criteria and site contaminants. It is a two stage system in which undissolved solids are filtered out first and then soluble uranium is extracted.

As SLAPS is a National Priorities List site upon which a CERCLA remediation is being carried out, the Corps is not required to obtain an official discharge permit from the Missouri Department of Natural Resources. However, the Corps must meet the substantive requirements of the state's regulations for discharge. This, in essence, means that the Corps submits the paperwork and follows the same sampling, reporting and discharging requirements as anyone who does obtain a permit, although a piece of paper entitled "permit" is never actually issued. (Consequently the state was technically correct when it indicated that the Corps has no state permit.)

One of the "substantive requirements" is that the Corps submits a quarterly report documenting the discharges and sampling results. For SLAPS, the first such report was due to the Missouri Department of Natural Resources (MDNR) by April 30, 1999. The Corps mailed the report to MDNR on April 28, 1999. None of the data indicate a violation of the state's current standards on water pollution control/discharges. However, it is my understanding that the state's personnel are currently reviewing these data and I cannot speak on their behalf. (It should be noted that when Mr. Geller responded to Ms. Drey on April 19, 1999, he did not have access to these data.)

It should be noted that MDNR discharge requirements for radionuclides do not exist. The MDNR has imposed a "monitor only" status for the radionuclides. However, the Corps has voluntarily imposed specific limits for radioisotopes as identified in 10 CFR 20, Appendix B.

Regarding the allegation of worker exposure, the Corps, in conjunction with its contractors, implements a strict safety and health program which is reviewed by MDNR prior to implementation. This program identifies levels of personal protective equipment by activity based upon an analysis of site specific hazards. It is best management practice to use all available data, including historical air monitoring and characterization data, to determine the necessary levels of personal protective equipment. It is also best management practice to implement engineering and administrative controls to mitigate these hazards before increasing levels of protective equipment. (Such an increase would only introduce additional hazards to the workers such as reduced peripheral vision and increased exposure time due to working at a slower pace.) Up to this time, use of respirators (including paper masks) has not been needed based on airborne concentrations encountered. However, workers are personally monitored. A statistically based sample of personnel who work in areas of greatest risk of intake are required to wear an air monitoring device to document the amount of contaminants in their breathing zone. The filters from the devices are then analyzed for gross alpha, gross beta, and individual radionuclides. To date, these data have not indicated a need for respirators. In addition to wearing the air monitoring devices, workers must wear thermoluminescent dosimeters (TLDs) to enter the site and are required to participate in a health monitoring program involving bioassays. The TLDs record exposure to external radioactivity, are retained on the site and sent to an independent certified laboratory for analysis. Use of bioassays confirms the lack of uptake of contamination.

Finally, every effort is made to ensure that dust does not leave the site. The site is monitored seven days per week and the area is misted as required to keep soils moist and minimize dust generation. Excavated areas are rolled to compress soils. Piles are covered with tarps. Railcar loading areas are hosed off to remove soils. To ensure that these efforts are effective, three stationary air monitoring stations are set up around areas of active remediation and load out of contaminated soils. These stations will operate continuously to record dust levels. To date, release of dust has not been a problem.

I hope this addresses your concerns. If you have any further questions, please contact my Executive Assistant, Jennifer Watkins, at 314-331-8016.

Sincerely,
Signed
Thomas J. Hodgini
Colonel, U.S. Army
District Engineer
Thomas J. Hodgini
Colonel, U. S. Army
District Engineer

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May 14, 1999

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Colonel Thomas Hodgini
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Dear Col. Hodgini:

I am writing to you regarding a couple of matters that have become of serious concern to me. The matters to which I am referring involve allegations related to the Corps of Engineers cleanup of the St. Louis Airport Site under the Formerly Utilized Sites Remedial Action Program (FUSRAP). These allegations were brought to the attention of a local activist by a worker involved in the cleanup at the site. The activist, in turn, brought them to the attention of all the local stakeholders, including officials from the Missouri Department of Natural Resources (MDNR).

The first allegation that the worker describes is that contaminated surface water and ground-water is being released directly into Cold Water Creek without the proper treatment or testing for radioactive contamination. The second allegation is in regard to worker safety at the site. The worker also expressed concerns about the fact that most of the workers at the site are not being required to wear respirators or even paper masks in spite of the fact that the site is often extremely windy and dusty. There is some concern that these workers might be ingesting materials containing radioactive particles.

Initially, officials from the Corps of Engineers responded to the accusation regarding the release of ground-water by indicating that there was nothing to be concerned about from the standpoint of protection of human health, and that all water discharged off this site into Coldwater Creek was in compliance with the Corps's existing permit with the state of Missouri. However, in its response to the activist's inquiry, MDNR claims that the Corps not only has no state permit, but they are also not in compliance with the state's current standards on water pollution control.

Colonel, in light of these allegations and the discrepancies between MDNR and the Corps on the release of groundwater into Coldwater creek, I urge you to conduct an investigation into these claims with the onsite involvement of MDNR officials. This is the only way to ensure that the cleanup is being conducted safely and in compliance with the applicable state standards.

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Thank you for your cooperation on this matter, and I look forward to hearing from you soon.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Talent", with a large, stylized initial "J" and a long, sweeping underline.

Jim Talent
Member of Congress

JT/th

Administrative Record for the
Formerly Utilized Sites
Remedial Action Program (FUSRAP)
North St. Louis County Sites

St. Louis County, Missouri



**US Army Corps
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K. Subject/Title: Response to Congressman Talent's Concerns for Health & Safety

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M. Author's Company: USACE

N. Recipient(s): James Talent

O. Recipient(s) Company: Congressman

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Q. Date: 5-21-99

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