



UNITED STATES ENVIRONMENTAL

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

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JUL 31 1997

OFFICE OF
THE REGIONAL ADMINISTRATOR

Mr. David A. Shorr, Director
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

AUG 5 1997

Dear Mr. Shorr:

Thank you for your letter of May 19, 1997, regarding the comment letter from the Environmental Protection Agency's (EPA) Office of Solid Waste and Emergency Response (OSWER) on the working draft of the "guiding principles for FUSRAP" report prepared by the Department of Energy's (DOE) Environmental Management Advisory Board (EMAB).

It is certainly EPA's plan to do what it can to ensure that future actions at the St. Louis FUSRAP sites, including the Phase I removal action planned for the St. Louis Airport Site (SLAPS), are carried out in accordance with the requirements and policies which govern cleanup under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA). While it is true that the CERCLA risk range is 10^{-4} to 10^{-6} with 10^{-6} excess cancer risk serving as the optimal point of departure for setting response action levels, based on discussions with the author of EPA's comment letter, it is incorrect to interpret these comments to mean that "...in order to meet the CERCLA risk range of 10^{-4} to 10^{-6} the soil cleanup level must be at least 5 pCi/g ...". Regarding this subject, the author was responding to EMAB's proposal that the 5/15 pCi/g cleanup standard for residual Ra-226 in soil serve as a no action screening level. The intent of the comment was to point out that a no action soil screening level should target the acceptable risk range under the most restrictive exposure scenarios, and under some exposure circumstances, concentrations lower than 5 pCi/g residual radium in soil will result in a calculated risk that exceeds the acceptable risk range. It is also true that concentrations greater than 5/15 pCi/g will result in calculated risks that fall

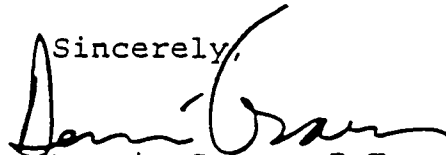
within the acceptable risk range under many land uses involving less constraining exposure scenarios. The appropriate cleanup level will be further dependent on other considerations such as depth of contamination, the radionuclide composition, and the time frame of concern.

Consistent with EPA's policies under CERCLA, cleanup levels should be established through the evaluation of site-specific exposure scenarios consistent with reasonably anticipated land use. We have confirmed in discussion with OSWER that the comment letter was not intended to limit consideration of reasonably anticipated land use in the derivation of cleanup levels.

A review of cleanup decisions established at other EPA and DOE lead sites involving soil contamination similar to that found in St. Louis shows that most cleanups carried out to date have adopted cleanup criteria analagous to the 5/15 pCi/g standard for Ra-226. However, EPA is currently in the process of finalizing guidance for cleanup of low-level radiation sites which establishes an acceptable exposure level rather than an acceptable concentration level. In its current form, this guidance sets a 15 millirem per year (mrem/yr) residual exposure rate for standard site cleanup. The 15 mrem/yr limit was developed in consideration of the acceptable risk range under Superfund. The guidance also builds in flexibility for consideration of land use. We will forward the guidance to you when it becomes final.

We appreciate and share your concern that cleanup actions for the St. Louis FUSRAP sites result in conditions that are protective of public health and the environment, and look forward to working with your agency to ensure that the Phase I removal action at SLAPS is consistent with this overall goal.

Sincerely,



Dennis Grams, P.E.

Regional Administrator

cc: Dave Bedan, MDNR
Tim Mott, OERR
Steve McCracken, DOE