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STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shorr, Director

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

June 20, 1995

Mr. David Adler
FUSRAP St. Louis Site Manager
Former Sites Restoration Division
U.S. Department of Energy
Oak Ridge Operations
P.O. Box 2001
Oak Ridge, TN 37831-8723

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RESPONSE TO-ST. LOUIS SITE-REQUEST FOR MDNR POSITION ON
DISPOSITION OF BELOW-GUIDELINE DEBRIS AND SOIL

Dear Mr. Adler:

On June 9, 1995 the Missouri Department of Natural Resources (MDNR) received the Department of Energy's (DOE) request for MDNR's position on the disposition of demolition debris and soils which have been contaminated by radionuclides to a level which is above background but which falls below the DOE cleanup criteria. This request was for two (2) disposal scenarios; on-site disposal as backfill and off-site disposal at landfills. Until a generic position for the disposition of the above mentioned material is developed MDNR shall evaluate proposals on a site specific basis.

This response addresses the site specific on-site disposal of demolition debris and soils which have been contaminated by radionuclides to a level which is above background but which falls below the DOE cleanup criteria at the Mallinckrodt Chemical St. Louis Downtown Site only.

After evaluation of the DOE proposal to dispose of the above mentioned materials on Mallinckrodt Chemical property MDNR concurs with the proposal provided that the following conditions are met;

- 1) Mallinckrodt Chemical be made aware of the fact that future changes in applicable cleanup criteria may require the removal of this material from their property.
- 2) Mallinckrodt Chemical be made aware of the fact that future changes in applicable cleanup criteria may require that deed restriction be placed on disposal areas.
- 3) That this disposal action be in compliance with all applicable local and county ordinances.

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- 4) That applicable DOE cleanup criteria are met.
- 5) That the intent of the As Low As Reasonably Achievable (ALARA) process is met.

In addition MDNR recommends that a permanent record be maintained of the quantities, activity levels (prior to removal), and locations of disposal for all such waste disposed of on site.

If you have any questions, please contact Larry Erickson at (314) 751-3176.

Sincerely,

HAZARDOUS WASTE PROGRAM



Ed Sadler
Director

ES:msa

cc: Dan Wall, EPA Region VII
MDNR Solid Waste Program
Mallinckrodt Chemical