

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

January 30, 1997

Mr. David Adler
U.S. Department of Energy
P.O. Box 2001
Oak Ridge, TN 37831-8723

Dear Mr. Adler:

The Federal Facilities Section of the Missouri Department of Natural Resources has received the document entitled *Remedial Action Plan for Building K at the St. Louis Downtown Site, St. Louis, Missouri, January, 1997.*

In reviewing said document several questions were identified which require further clarification. In addition, further documentation pertaining to specific items has been requested. Please direct your written response to the following request to Hazardous Waste Program, ATTN: Mr. Mitchell C. Scherzinger, P.O. Box 176, Jefferson City, Missouri 65102.

Section 2, Building K, Description and Background

Page 1, Paragraph 2, Sentence 2, "AEC work was performed in area KIE."
Which of the AEC processes were performed in the K series building?

Page 1, Paragraph 2, Sentence 4, "Decontamination work was conducted from 1948 to 1950 in accordance with the then current AEC criteria,...." Define criteria to which Building K was remediated, the volume of material removed, and the final disposition of waste removed.

Page 1, Paragraph 3, Sentence 6, "All the surveys...residual levels of radioactivity in excess of applicable guidelines." As a matter of clarity, please reference Section 3.1, Remedial Action Criteria, Section 3.2, Boundary Delineation/Data Gap Sampling (1986)

Page 4, Paragraph 1, Sentence 3, "Discussions were held with the property owner to determine the processes used during and after AEC activities." The Federal Facilities Section (FFS) requests that this information be provided for evaluation.

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Page 4, Paragraph 2, "Samples were also analyzed for isotopic radionuclides including uranium-238; radium-226; thorium-228, thorium-232, and thorium-230; and potassium-40." Explain the rationale for the exclusion of uranium - 235 daughter products from this sampling campaign.

Page 5, Paragraph 2, Sentence 2, "Air sampling conducted in the building indicated that radon concentrations are well below conservative action levels." Define parameters utilized in the radon evaluation and the maximum levels (or range of levels) detected.

Section 3.3, Decontamination, Dismantlement, and Independent Verification

Page 5, Paragraph 3, Last Sentence, "The IVC will release the building for use without radiological restriction before demolition of the building is conducted." The FFS requests a copy of the IVC report prior to the demolition of the building.

Section 3.4, Packaging, Transportation, and Disposal

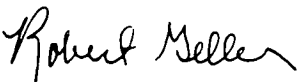
General Comment: Previous discussion between FFS staff and DOE contractors indicated that characterization of contaminated materials would be performed to determine the ratios of radioactive contaminants of concern. This information was to be utilized in the decision regarding the disposition of the building once demolished.

Will an isotope specific characterization be conducted on removed wastes?

Your cooperation in these issues is appreciated. Should you have any questions feel free to discuss them with Mr. Scherzinger at (573) 751-1968.

Respectfully yours,

HAZARDOUS WASTE PROGRAM


Robert Geller, Chief
Federal Facilities Section

RG:mse

c: Dan Wall, EPA - Region VII