



Mel Carnahan, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

September 4, 1998

Ms. Sharon Cotner, Project Manager
Formerly Utilized Sites Remedial Action Project
Department of the Army
St. Louis District, Corps of Engineers
9170 Latty Avenue
Hazelwood, Missouri 63134

RE: Final Record of Decision for the St. Louis Downtown Site, July 1998

Dear Ms. Cotner:

Departmental staff has reviewed the most recent version of the Record of Decision (ROD) for the St. Louis Downtown Site (SLDS) and is very pleased with the progress made on issues of importance to the department. We are glad to see that the list of applicable or relevant and appropriate requirements has been significantly expanded. Progress has also been made in the groundwater portion of the remedy. It appears that the ROD is acceptable to the Department of Natural Resources based on our understanding that:

- ◆ perimeter monitoring is the 3 dimensional monitoring of the groundwater in and around the operable unit.
- ◆ the A hydrostratigraphic unit will be monitored to establish baseline groundwater data, measure the effectiveness of the source removal action and determine the fate and transport of the residual contaminants.
- ◆ the B hydrostratigraphic unit will be monitored to demonstrate there are no impacts above the established thresholds.
- ◆ the thresholds or triggers for initiating the Ground-water Remedial Action Alternative Assessment (GRAAA) will be drinking water maximum contaminant levels (MCLs) for cadmium and arsenic and the groundwater concentration limits listed in 40 CFR 192 for combined uranium, combined radium and gross alpha-particle activity. Also, sampling for VOCs during the RA phase will be performed.

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Thank you for your efforts and for considering the department's views and comments in finalizing this document. We look forward to working with the U. S. Army Corps of Engineers in this major step toward remediating the legacy of the Nuclear Weapons Complex in Missouri.

If you have any questions regarding this letter, or need further information, you may contact Mr. Robert Geller of my staff at (573) 751-3907.

Sincerely,

HAZARDOUS WASTE PROGRAM



Cindy Kemper
Director

CK:lee

c: Dan Wall, EPA - Region VII
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