

FUSRAP ST. LOUIS SITES CITIZENS OUTREACH MEETING JANUARY 23, 2025

Jo Anne Wade – North County Project Manager
Figerald Garcia – Downtown Site Project Manager
Susan Adams – St. Louis Sites Program Manager
Phil Moser – Chief, FUSRAP and Environmental Branch



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AGENDA



- Opening Remarks
- Federal Facility Agreement for the St. Louis Sites
- FUSRAP St. Louis Sites updates
 - St. Louis Downtown Site (SLDS)
 - St. Louis Airport Site Vicinity Properties (SLAPS VPs)
- Explanation of Significant Differences for the FUSRAP North St. Louis County Sites
- Fifth Five-Year Review
- Contact Information
- Questions / Comments



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FEDERAL FACILITY AGREEMENT FOR THE ST. LOUIS SITES



In 1990, the Environmental Protection Agency (EPA) and the Department of Energy (DOE) signed a Federal Facility Agreement (FFA) that covers response actions at the St. Louis Airport Site, Hazelwood Interim Storage Site (HISS)/Futura Site, Mallinckrodt Chemical Works Site and Vicinity Properties.





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FEDERAL FACILITY AGREEMENT FOR THE ST. LOUIS SITES



The Agreement covers the cleanup of:

- All wastes, including but not limited to radiological contaminated wastes, resulting from or associated with uranium manufacturing or processing activities conducted at the St. Louis Downtown Sites, and
- Other chemical or non-radiological wastes that have been mixed or commingled with radiologically contaminated wastes resulting from or associated with uranium manufacturing or processing activities conducted at the St. Louis Downtown Site.



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FEDERAL FACILITY AGREEMENT FOR THE ST. LOUIS SITES



The Agreement:

- States that the cleanup will be performed under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).
- Gives a history of the sites.
- Establishes responsibilities of DOE and EPA.
- Determines the relationship and communication process between DOE and EPA.
- States the review and approval process of remedial response documents.
- Provides a process to dispute disagreements between the parties and a process to resolve disagreements.



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FEDERAL FACILITY AGREEMENT FOR THE ST. LOUIS SITES



When the Formerly Utilized Sites Remedial Action Program (FUSRAP) execution was transferred to USACE in 1997, the U.S. Army Corps of Engineers (USACE) agreed to honor existing DOE commitments to the extent consistent with USACE's legal authority.





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FEDERAL FACILITY AGREEMENT FOR THE ST. LOUIS SITES



EPA and USACE

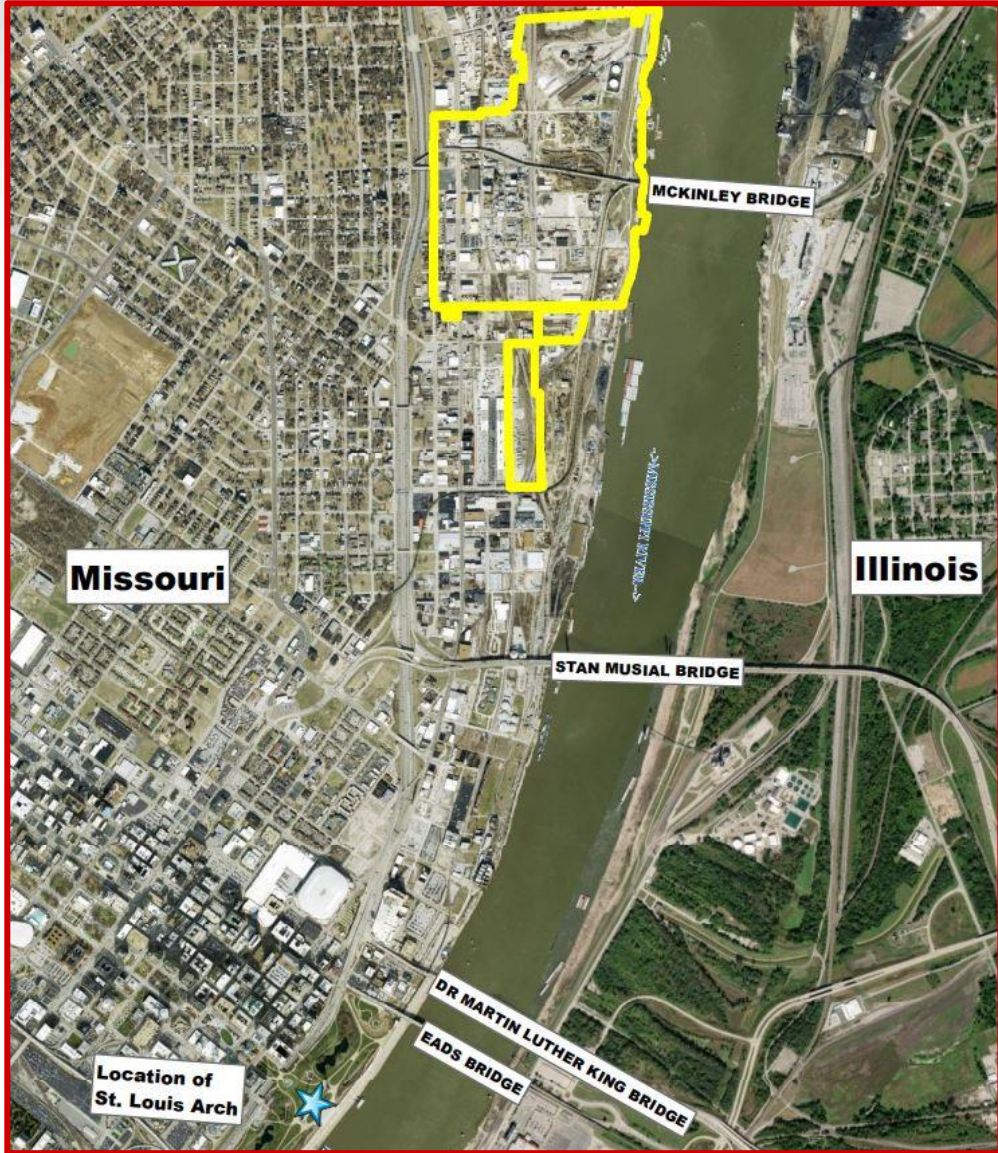
- Meet monthly to provide site updates and to answer questions.
- USACE provides site documents to EPA for review and comment.
- EPA has access to the sites and may request site visits.
- EPA and USACE have established a good working relationship.





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ST. LOUIS DOWNTOWN SITE (SLDS)



General Area of Mallinckrodt Plants/Property

Adjacent Properties





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ST. LOUIS DOWNTOWN SITE (SLDS)

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Since 1997

- 345,390 cubic yards (~4,161 railcars)
- 53 properties/areas released for beneficial use

This Fiscal Year (Oct 2024 – Present)

- 1,329 cubic yards (~16 railcars)
- Currently remediating at:
 - Norfolk Southern Railroad (NSRR)/2nd Street
 - Kiesel property





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SLAPS VICINITY PROPERTIES UPDATES

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- In November 2024, USACE completed remediating the banks of Coldwater Creek (CWC) under the McDonnell Boulevard Bridge removing 27,287 cubic yards of contaminated material. St. Louis County will start construction on a new bridge in Spring 2025.



Remedial activities on McDonnell Boulevard

- USACE continues remedial activities on [McDonnell Boulevard](#) removing 31,024 cubic yards of contaminated material.



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SLAPS VICINITY PROPERTIES UPDATES



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- In February, USACE will start remedial activities on Latty Avenue and VP-38.
- In Spring 2025, USACE will start remedial activities on CWC floodplain properties CWC-29 through 33, CWC-45 and in CWC. These properties are located south of the St. Denis Bridge.
- USACE continues inspecting CWC properties to confirm that no intrusive activities are taking place on the properties.
- During the inspections, USACE is installing signs around contaminated areas where property owners have given permission.
- USACE continues Pre-Design Investigation (PDI) Sampling of CWC to develop remedial designs to clean up contaminated areas in and adjacent to CWC.



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SLAPS VICINITY PROPERTIES UPDATES

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SIGNS

- As requested by the community, elected officials, and EPA, USACE started placing signs around contaminated areas along CWC in advance of the cleanup efforts to protect public health.
- The first signs were installed December 3, 2024.
- Permission from the property owner is required to place the signs.
- This helps to prevent soil disturbance as these low-level radioactive materials don't present a risk if the ground isn't disturbed.
- USACE's objective is to keep the community informed of its efforts to ensure transparency.





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EXPLANATION OF SIGNIFICANT DIFFERENCES



- An Explanation of Significant Differences (ESD) documents a significant change in the selected remedy with respect to scope, performance, or cost.
- The change does not fundamentally alter the selected remedy.
- An ESD provides the public the following information:
 - Describes the nature of the significant change.
 - Summarizes the information that led to making the change.
 - Affirms that the revised remedy complies with the National Contingency Plan and CERCLA.



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NORTH STL COUNTY ESD DEVELOPMENT



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USACE is developing two (2) ESDs to the North St. Louis County ROD this Fiscal Year 2025.

1. Soils Beneath Roads, Railroads, and Permanent Structures

- The selected remedy in the ROD for inaccessible soils is land use controls.
- USACE is considering modifying the selected remedy to authorize excavation and offsite disposal when conditions warrant.
- If this change is implemented, impacted soils beneath roads, rail lines, and other permanent structures would be evaluated on a case-by-case basis to determine if excavation and offsite disposal was warranted.

2. ROD Boundary Extension for Coldwater Creek Floodplain Areas

- USACE is considering modifying the selected remedy to document changes to the ROD geographical area to include floodplain properties adjacent to Coldwater Creek from Dunn Road to the Missouri River.
- If this change is implemented, the ROD boundary would be expanded by approximately 750 acres and include more than 600 properties adjacent to CWC.



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FIVE-YEAR REVIEW

- The Five-Year Review (FYR) evaluates the implementation and performance of the selected remedy to determine if the remedy continues to be protective of human health and the environment.
- FYRs are required under Section 121(c) of CERCLA.
- After completion of the first statutory or policy FYR, the trigger for subsequent reviews is the signature date of the previous report.
- FYRs continue throughout the life of the site until hazardous substances, pollutants or contaminants no longer remain at levels that don't allow for unlimited use/unrestricted exposure.



FIVE-YEAR REVIEW COMPONENTS



- Six components are used in the FYR process:
 - community involvement and notification,
 - document review,
 - data review and analysis,
 - site inspection,
 - interviews and
 - protectiveness determination.
- Together, these components assess the remedy's performance, and, ultimately, determine the protectiveness of that remedy.



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FIVE-YEAR REVIEW ST. LOUIS FUSRAP SITES



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- The FYR is required for the St. Louis FUSRAP sites because hazardous substances, pollutants and contaminants remain at the sites above levels that allow for unlimited use/unrestricted exposure.
- The FYR evaluates the protectiveness of each St. Louis FUSRAP Site ROD:
 - the 1998 ROD for St. Louis Downtown Site (SLDS) and
 - the 2005 North St. Louis County ROD (National Priority List site).



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FIVE-YEAR REVIEW

- The Fifth FYR documents for the St. Louis FUSRAP sites have been developed and are in the review process.
- The reviewers consist of the USACE St. Louis FUSRAP team, the USACE Environmental and Munitions Center of Expertise (EMCX), the EPA, the DOE, the Missouri Department of Natural Resources (MDNR), and the Missouri Department of Health and Senior Services (MDHSS).
- Interview forms will be sent to elected officials, business and property owners, and local citizens in a few weeks.
- The Fifth FYR will be completed in August 2025.



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CONTACT US

- **Website**

FUSRAP <https://www.mvs.usace.army.mil/Missions/FUSRAP/>

St. Louis District <https://www.mvs.usace.army.mil/>

- **Email** STLFUSRAP@usace.army.mil

- **General Information**

FUSRAP Office 314-260-3905

Public Affairs Office 314-331-8000

- **Administrative Record**

Electronic Reading Room

<https://www.mvs.usace.army.mil/Missions/FUSRAP/Reading-Room/>

FUSRAP Office, 114 James S. McDonnell Blvd., Hazelwood, MO

Hours: Weekdays from 8 a.m. to 3 p.m. – by appointment

QUESTIONS/COMMENTS



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