

STATEMENT OF TECHNICAL REVIEW

Performance Work Statement for Environmental Remediation Services Landfills 2 and 3 Fort Leonard Wood, Missouri and Hanley Area Former St. Louis Ordnance Plant, Missouri

Community Involvement Plan, St. Louis Ordnance Plant, Former Hanley Area,

The Conti/CH2M HILL Team has completed the technical review of the Final submittal of the Community Involvement Plan. Notice is hereby given that an independent technical review has been conducted that is appropriate to the level of risk and complexity inherent in the project, as defined in the Quality Control Plan. During the independent technical review, compliance with established policy principles and procedures, utilizing justified and valid assumptions, was verified. This included review of assumptions; methods, procedures and material used in analyses; the appropriateness of data used and level of data obtained; and reasonableness of the results including whether the product meets the customer's needs consistent with the law and existing USACE policy.

Technical Reviewer	Signature	Date of Review
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Quality Control System Manager (for QCP)
or Project Manager

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Signature



ITR Leader

Catherine Barnett

Signature



Final

**Community Involvement Plan
St. Louis Ordnance Plant
Former Hanley Area
St. Louis, Missouri**

Prepared for
**U.S. Army Corps of Engineers,
Kansas City District
Contract No. W912D05-D-0002
Delivery Order No. 0007**

April 2008

Prepared by



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Acronyms

CERCLA	Comprehensive Environmental Restoration, Compensation, and Liability Act
I-70	Interstate 70
SLOP	St. Louis Ordnance Plant

SECTION 1

Introduction

This community involvement plan was prepared for the U.S. Army Corps of Engineers, Kansas City District and the 89th Regional Readiness Command in support of the Defense Environmental Restoration Program under Contract Number W912DQ-05-D-0002, Delivery Order Number 0007 at the St. Louis Ordnance Plant (SLOP), former Hanley Area located in St. Louis, Missouri. Although the former SLOP site is not on the National Priorities List, the U.S. Army Corps of Engineers follows the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process. This community involvement plan addresses issues of community concern regarding the environmental investigation and restoration activities at the former SLOP.

The Defense Environmental Restoration Program is part of a U.S. Department of Defense effort to identify and correct environmental contamination resulting from past practices. Within the Defense Environmental Restoration Program, the Department of Defense established the Installation Restoration Program in 1986. The Installation Restoration Program identifies, evaluates, and cleans up former disposal and spill sites at Department of Defense facilities nationwide.

The goal of the community involvement plan is to promote and document community awareness of current and planned cleanup activities at the former SLOP site and to present public opinions regarding these activities. This plan presents the status of the environmental investigation and cleanup activities; identifies issues of concern to stakeholders; outlines how stakeholders can be involved in the decision-making process; and serves as a public record of community involvement and participation. The community involvement plan is organized into the following sections:

- Introduction
- Installation description and background
- Environmental restoration process
- Community background
- Community involvement program
- References
- Appendices

Because the level of concern about environmental issues expressed by the community can change over time, this community involvement plan is a working document and will continue to be updated periodically. The Army's intent is to present factual and timely information, obtain community feedback, and promote an understanding of the ongoing activities being performed.

Questions about this community involvement plan may be addressed to William Titterington, Community Involvement Coordinator, of the 89th Regional Readiness Command at 316-681-1759, extension 1469.

SECTION 2

Installation Description and Background

The SLOP former Hanley Area is located on the western boundary of the city limits of St. Louis, Missouri, adjacent to St. Louis County. The site is approximately 0.25 mile south of the intersection of Interstate 70 (I-70) and Goodfellow Boulevard (Figure 2-1). The SLOP former Hanley Area is north and adjacent to the Sverdrup U.S. Army Reserve Center located at 4301 Goodfellow Boulevard in St. Louis, Missouri.

From 1941 to 1945, the former SLOP was solely operated as a small arms ammunition production facility. The primary products of the ordnance plant were 0.30- and 0.50-caliber ammunition. The overall plant was divided into two areas designated Plant Area No. 1, east of Goodfellow Boulevard, and Plant Area No. 2, west of Goodfellow Boulevard. Much of Plant Area No. 1 was used for the metal forming process (casings and projectiles), loading of final product, packing, and shipping. On the southern end of Plant Area No. 1, there was a primer and incendiary component manufacturing facility. Plant Area No. 2 solely produced the primer and tracers components used in assembling the final product. These processes included the blending of primary explosives, incendiary compounds, and the tracer charging of 0.30- and 0.50-caliber projectiles.

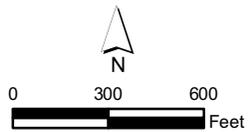
From 1945 to 1959, including the Korean War, some buildings within Plant Area No. 2 of the original SLOP were used by the U.S. Army Adjutant General's Office for maintaining service records and the U.S. Department of Defense Finance Center for classrooms. In addition during this period, the facility was being upgraded for additional small arms manufacturing capabilities. Machinery was installed, but the plant never commenced or resumed production during the Korean War Era. After the Korean Conflict, the machinery was removed, transferred to other facilities, or declared excess and disposed of.

In 1959, Hanley Industries, Inc. (a subsidiary of KDI Precision Products) leased 14.68 acres of the 27.68-acre Plant Area No. 2 of the former SLOP and conducted operations from 1959 to 1979. During its tenure, Hanley Industries produced specialized devices for the U.S. military and the National Aeronautics and Space Administration.

In the early 1960s, the Goodfellow U.S. Army Reserve Center (now the Sverdrup U.S. Army Reserve Center) was established on the remaining 13 acres of the site. At the time of the transfer, much of the 13 acres still contained the buildings, magazines, and bunkers that were part of the primer manufacturing area of Plant Area No. 2. The Goodfellow U.S. Army Reserve Center transferred some of the 13 acres to the U.S. Department of Labor, which is now being used as a Job Corps training center. Currently, the 89th Regional Readiness Command owns the SLOP former Hanley Area and the Sverdrup U.S. Army Reserve Center.

Most of the 14.68 acres encompassed by the former Hanley Area housed a series of warehouse buildings, bunkers, and related buildings. Between 2004 and 2007, buildings and bunkers, with the exception of Buildings 219A, 219D, and 219G, were demolished by an 89th Regional Readiness Command contractor. The site contains a number of underground

rooms (former basements), tunnels for service utilities, and a combined underground wastewater and stormwater collection system. The underground structures are still intact.



LEGEND
 Site Boundary

FIGURE 2-1
SITE LOCATION MAP
 St. Louis Ordnance Plant
 Former Hanley Area
 St. Louis, Missouri

CH2MHILL

SECTION 3

Installation Restoration Program Summary

Prior to the 1970s, the federal government and private companies used what were commonly accepted disposal practices of contaminants without knowing the full environmental and public health risks associated with hazardous substances and wastes. In 1975, growing environmental concerns prompted the U.S. Department of Defense to begin identifying contaminated sites to characterize issues and address cleanup resulting from these past practices.

In 1980, Congress passed CERCLA (also known as Superfund) requiring identification, investigation, and cleanup of sites contaminated by past releases of hazardous substances. In 1986, Congress amended CERCLA to create the Defense Environmental Restoration Program and its corresponding funding component, the Defense Environmental Restoration Account. This program is managed by the Office of the Deputy Under Secretary of Defense (Installations and Environment) within the Department of Defense.

Within the Defense Environmental Restoration Program, the Department of Defense created the Installation Restoration Program to reduce risks to human health and the environment at active Army installations. The Installation Restoration Program focuses on releases of hazardous substances, pollutants, or contaminants that pose environmental health and safety risks. Under this program, the SLOP former Hanley Area has been determined eligible for environmental cleanup.

Under the Defense Environmental Restoration Program, the U.S. Army Environmental Command has been designated to provide management and oversight of cleanup activities at active Army and U.S. Army Reserve installations. The U.S. Army Environmental Command is the responsible agency for the Army's cleanup activities at this Installation Restoration Program site, which is owned by the 89th Regional Readiness Command. Additionally, the U.S. Army Corps of Engineers, Kansas City District is providing environmental technical assistance to the U.S. Army Environmental Command in support of its cleanup activities at the former SLOP site.

3.1 Environmental Restoration Process

In accordance with U.S. Department of Defense policy, the environmental program for the former SLOP site will follow the CERCLA process even though the site is not a National Priorities List site. The following is a summary of the steps involved in the CERCLA process.

3.1.1 Step 1—Site Discovery

Sites or “areas of concern” that require additional investigation and possibly restoration are identified through an environmental baseline survey, site visits, etc.

3.1.2 Step 2—Preliminary Assessment/Site Inspection

The preliminary assessment/site inspection involves a records review, site visits, and limited soil and groundwater sampling to determine whether the site warrants further investigation.

3.1.3 Step 3—Remedial Investigation, Feasibility Study, and Proposed Plan

The remedial investigation/feasibility study involves more comprehensive sampling to identify the nature and extent of contamination at the site. The remedial investigation helps to determine the need for and extent of cleanup that might be required. The feasibility study identifies, describes, and evaluates various alternatives for cleaning up the site. The proposed plan describes the cleanup alternatives and identifies the preferred alternative. The proposed plan is submitted for public comment for a minimum of 30 days.

3.1.4 Step 4—Decision Document

Following the public comment period, the final remedy is described in a legal public document called a decision document.

3.1.5 Step 5—Remedial Design

During this phase, the specific engineering aspects of the remedy are designed, including land use controls, etc., based on the remedies negotiated and agreed upon in the decision document.

3.1.6 Step 6—Remedial Action/Cleanup

Upon conclusion of the design phase, the remedial action or cleanup effort is initiated and completed.

3.2 Environmental Restoration at the SLOP Former Hanley Area

3.2.1 Previous Environmental Work

A brief history of actions performed to date at the SLOP former Hanley Area is summarized below.

- **1981 – U.S. Army Toxic and Hazardous Materials Agency:** The U.S. Army Toxic and Hazardous Materials Agency conducted limited sampling of building surfaces, sediment, and surface water. Metals and explosives residues were found on building walls.
- **1991 – U.S. Army Toxic and Hazardous Materials Agency:** The U.S. Army Toxic and Hazardous Materials Agency conducted additional soil and surface water sampling plus an asbestos survey. Results indicated soil contaminated with lead and surface water from tunnels contaminated with lead and explosives. The study recommended asbestos abatement.

- **1998 – 89th Regional Readiness Command:** On behalf of the 89th Regional Readiness Command, HARZA, Inc. performed a site investigation. The objective of this investigation was to determine the presence of volatile organic compounds (that is, contaminants that evaporate into the air easily), semivolatile organic compounds, explosives, and metals in soil and sediment. The investigation concluded that volatile organic compounds, metals, and explosives were present in site soil and sediment.
- **2001 – 89th Regional Readiness Command:** On behalf of the 89th Regional Readiness Command, TapanAm, Inc. performed a preliminary assessment/site investigation. The assessment evaluated the extent of surface soil contamination and the potential for contaminant migration by surface routes through underground utility tunnels. The potential for groundwater contamination also was evaluated. The assessment confirmed the presence of metals and semivolatile organic compounds in surface and subsurface soil. Sediment and surface water in powder wells (sumps) contained metals and explosives. The assessment also identified carbon tetrachloride in an onsite monitoring well, in addition to volatile organic compounds in an upgradient monitoring well.
- **2003 – 89th Regional Readiness Command:** On behalf of the 89th Regional Readiness Command, Shaw Environmental, Inc. conducted a limited Phase II site assessment in response to the volatile organic compounds found in monitoring wells during the 2001 preliminary assessment/site investigation sampling. Additional soil and groundwater sampling was performed to determine if soil was affected by volatile organic compounds and the extent of groundwater contamination. Results did not indicate soil contamination in the vicinity of the upgradient and onsite wells. Groundwater results indicated that volatile organic compounds were present above detection limits, but did not exceed drinking water cleanup levels.
- **2004 – 89th Regional Readiness Command:** The 89th Regional Readiness Command hired SCS Engineers to conduct sampling and analyses of building materials, and perform asbestos abatement of buildings and subsequent demolition of buildings at the SLOP former Hanley Area. This work was completed in January 2006.
- **2005 – U.S. Army Environmental Command:** In 2004, the U.S. Army Environmental Command tasked the U.S. Army Corps of Engineers, Kansas City District with compiling environmental data collected from previous investigations, evaluating the data for completeness, and identifying potential data gaps. Phase I remedial investigation fieldwork began in December 2004 and concluded in February 2005. The investigation, which included surface soil, subsurface soil, and groundwater sampling, was termed Phase I to acknowledge the possibility that newly collected data may reveal additional gaps for a follow-on investigative phase.

The results of the Phase I remedial investigation fieldwork confirmed localized metals contamination limited to surface soil. Groundwater results confirmed volatile organic compound contamination in an onsite and upgradient well. In addition, the groundwater results identified volatile organic compound contamination in the vicinity of former Building 220, which was adjacent to Stratford Avenue.

- **2006 – 89th Regional Readiness Command:** The 89th Regional Readiness Command hired SCS Engineers to perform asbestos abatement and subsequent demolition of

former Building 220 at the SLOP former Hanley Area. This work was completed in January 2007.

3.2.2 Current Investigations

In 2007, the U.S. Army Environmental Command tasked the U.S. Army Corps of Engineers, Kansas City District to perform additional soil and groundwater sampling at the former Building 220 area and on public right-of-ways across Stratford Avenue to characterize the nature and extent of volatile organic compound contamination in groundwater. This supplemental Phase II remedial investigation fieldwork included installing groundwater monitoring wells and soil and groundwater sampling and analysis. The results from this Phase II investigation effort confirmed volatile organic compound contamination in soil and groundwater at the former Building 220 area above federal maximum contaminant levels. In addition, contaminated groundwater with volatile organic compound concentrations exceeding maximum contaminant levels was found to be moving offsite.

Based on the data results obtained from the former Building 220 area during the supplemental Phase II remedial investigation in 2007, the U.S. Army Environmental Command directed the U.S. Army Corps of Engineers, Kansas City District to award a contract with a U.S. Army Corps of Engineers, Kansas City District contractor to perform future environmental actions, including soil and groundwater cleanup. A contract was awarded in late September 2007, and work is underway.

3.2.3 Upcoming Activities

The 89th Regional Readiness Command will be initiating contact with residents along Stratford Avenue to convey information related to the field investigation results obtained in 2007 and to seek permission for the Army contractor to conduct testing on residential property. The purpose of testing on residential property is to determine if groundwater contamination extends beyond Stratford Avenue, and if so, if there a risk posed to residents from vapor intrusion. Activities slated for 2008 include the following:

- A vapor intrusion investigation consisting of collecting soil gas samples from each side of eight residences: five along Stratford Avenue and three along Goodfellow Boulevard
- A remedial investigation consisting of collecting soil and groundwater samples from onsite and offsite locations within the adjacent residential neighborhood across Stratford Avenue

Community Background

4.1 Community Profile

The SLOP former Hanley Area is located in the Mark Twain/I-70 Industrial neighborhood. The Mark Twain/I-70 Industrial neighborhood is bounded by I-70 to the north, Natural Bridge Avenue to the south, North Kingshighway Boulevard to the east, and Philbrook Avenue to the west (Figure 2-1).

According to the 2000 Census, the neighborhood's population was 1,361. Seventy-four percent of the residents are African-American, and 24 percent are white. The remaining 2 percent include residents who identified themselves as American Indian and Alaskan Native, Asian, some other race, and two or more races. Per capita income was \$10,470, and 38.5 percent of the residents were below the poverty level.

The neighborhood is highly industrialized. Central States Diversified Inc. and ABB Power Transmission and Distribution are among the businesses located in the area. Redevelopment efforts are underway in the neighborhood, including the transfer of ownership of the St. Louis Army Ammunition Plant to the Land Clearance for Redevelopment Authority of the City of St. Louis. The facility is an 18-acre former Army ammunition plant located at I-70 and Goodfellow Boulevard.

4.2 Environmental Justice

On February 11, 1994, President Clinton issued Executive Order 12898, entitled *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (Appendix A). The measure focuses federal attention on the environmental and human health conditions of minority and low-income populations with the goal of achieving environmental protection for all communities. The measure requires federal agencies, including the Department of Defense, to identify and address disproportionately high and adverse human health and environmental effects of federal programs, policies, and activities on minority and low-income populations.

As part of the Army's commitment to achieving the goals of the executive order, all public involvement and outreach activities for this project will address the specific concerns and information needs of minority and low-income residents who live near the site.

4.3 Community Involvement History

In April 2004, the Army began community involvement efforts for environmental activities at the SLOP former Hanley Area, and the Administrative Record file was established at the St. Louis Central Public Library. A notice announcing the availability of the file and points of contact for the U.S. Army Environmental Command and U.S. Army Corps of Engineers was published in the *St. Louis Post-Dispatch* and *St. Louis American* in January 2005.

In June 2006, nearby residents were mailed a letter informing them of the Army's investigation of potential groundwater contamination in the vicinity of the U.S. Army Reserve Center. A second letter dated September 17, 2007, notified residents and property owners that the Army will be seeking access to some properties to collect environmental samples.

The Army has coordinated with the alderman who represents the neighborhood and Job Corps training center staff on an ongoing basis. Appendix B contains community involvement materials prepared by the Army for environmental restoration activities at the former SLOP site.

4.4 Community Concerns and Information Needs

Residents who live near the facility have expressed no concern to the Army about environmental restoration activities at the former SLOP site. One inquiry was received on June 20, 2006, in response to the letter sent June 7, 2006, to residents and property owners, but it was unrelated to Army environmental activities at the facility.

On March 28, 2008, the Army mailed questionnaires to seven community members. The affected community is defined as the five homes immediately across Stratford Avenue from the site and the first two homes along Goodfellow Boulevard immediately north of the site. The questionnaire and accompanying cover letter explaining the objectives of the survey are included in Appendix C.

One questionnaire was returned by the April 11, 2008, deadline. The respondent had received the June 7, 2007, letter from the Army and is aware of Army environmental programs at the former SLOP and Sverdrup U.S. Army Reserve Center. The respondent said he would be interested in finding out the results of soil sampling at a property he owns in the neighborhood and the Army's plan for future use of the facility.

Stakeholders' concerns and questions may increase as the remedial investigation progresses and area residents see field crews and equipment working in their neighborhood or are asked by the Army to grant access to their properties for sampling. Residents whose homes are sampled will want to be informed about the results. As work progresses, local news media also may become interested in activities at the facility.

Although residents are connected to the municipal water supply, community concerns may focus on potential adverse health effects from contamination. Information and outreach efforts can help address these concerns.

SECTION 5

Community Involvement Program

This section provides a summary of community involvement activities for the SLOP former Hanley Area. Input from staff from the U.S. Army Corps of Engineers, 89th Regional Readiness Command, Missouri Department of Natural Resources, and Alderman Jeffrey Boyd form the basis for developing the community involvement goals and activities.

The goal of community involvement activities is to foster communication between the installation and the surrounding communities by the doing following:

- Effectively managing restoration efforts at the site by initiating communication that provides stakeholders with timely and accurate information about restoration activities
- Establishing an effective two-way communications process with key community leaders and interested parties (Appendix D)
- Successfully integrating and coordinating communications activities with technical activities that occur onsite

5.1 Community Involvement Activities

To accomplish this goal, the Army will implement the community involvement activities described below.

5.1.1 Ongoing Contact with Community Members

Army staff will coordinate with local government officials and community members to keep them informed about project activities and to obtain feedback on their concerns. These stakeholders will be informed about progress throughout the cleanup project via updated fact sheets mailed following milestone events and no less than semiannually. Government and community members will be notified via mailings prior to field activities that will be conducted at the site. Public meetings will be held with the community and government officials following each phase of the investigation to inform them of the results and obtain stakeholder feedback. In addition to the public meeting for comments on the proposed plan, a public meeting will be held at the completion of the remedial action to allow for stakeholder input.

5.1.2 Administrative Record/Information Repository

The Administrative Record is the complete record of all decision documents developed and official correspondence transmitted for an environmental program. The Army will update the Administrative Record when final documents become available. The Administrative Record is available for public review at the following information repository:

St. Louis Central Public Library
1301 Olive Street
St. Louis, MO 63103
314-241-2288

5.1.3 Community Survey

Upon completion of remedial investigation field activities, the Army will mail a brief survey to property owners and residents who live near the SLOP former Hanley Area to obtain feedback on the environmental investigation and remediation program. After receiving the feedback, it will be used to adjust the community efforts and, if necessary, the community involvement plan.

5.1.4 Fact Sheets

The Army will produce four fact sheets for Installation Restoration Program activities at the SLOP former Hanley Area. Fact sheets will be produced to coincide with the following technical activities or milestones:

- Completion of vapor intrusion investigation
- Beginning of the remedial investigation
- Completion of the feasibility study and availability of the proposed plan for review and comment
- Selection of a remedy for the SLOP former Hanley Area

Fact sheets will contain clear, accurate descriptions of technical information prepared in a style and format that will encourage use and understanding. The Army will send fact sheets to stakeholders on the project mailing list and provide copies at the public meeting. These fact sheets can be found in Appendix B.

5.1.5 Mailing List

Throughout the project, the Army will maintain a mailing list for distributing information to stakeholders. The mailing list can include nearby residents and property owners, community groups, environmental organizations, businesses, representatives from the news media, and local, state, and federal officials.

5.1.6 Public Comment Period and Public Notices

Upon completion of the proposed plan, the Army will announce a 30-day public comment period to enable stakeholders and the community to review and comment on the alternatives evaluated and the Army's recommended alternative. A public notice will

announce the comment period, contain a brief summary of the alternatives and proposed plan, and provide a point of contact for submitting comments. The notice will be published in the *St. Louis Post-Dispatch* and the *St. Louis American*. In addition, the cost for display ads will be researched, and if not cost prohibitive, display ads will be used for public notices as well.

5.1.7 Public Meeting

The Army will conduct a public meeting during the 30-day public comment period on the proposed plan. If other community meetings are scheduled near the time that the Army wants to hold a public meeting, the Army will make an effort to hold the meeting in conjunction with already scheduled community meetings. The public meeting will be held in a convenient location in the community, such as the Sverdrup U.S. Army Reserve Center located at 4301 Goodfellow Boulevard. A certified court reporter will make a transcript of the public meeting proceedings. The transcript will be included in the Administrative Record.

5.1.8 Responsiveness Summary

The Army will prepare a summary of the written and oral comments made by the public on the alternatives and the proposed plan and the Army's responses to those comments. The responsiveness summary will be included in the decision document and made available for public review in the information repository.

5.1.9 Media Advisories and News Releases

Media advisories and news releases that communicate important information about Installation Restoration Program activities at the SLOP former Hanley Area will be issued to the *St. Louis Post-Dispatch*, *St. Louis American*, and radio and television stations that serve the area (Appendix D). Media advisories and news releases will be prepared to announce the beginning of the public comment period for the proposed plan and as needed during the course of the project.

5.1.10 Army Environmental Command Website

Additional information on U.S. Army environmental programs is available at the U.S. Army Environmental Command Website at <http://aec.army.mil/usaec/>.

5.1.11 Revise Community Involvement Plan

The Army will revise the community involvement plan when significant changes are made to the community involvement program or if the focus or intensity of community concerns changes, but not less than every 5 years.

5.2 Community Involvement Schedule

Community involvement activities are timed to coincide with technical milestones in environmental restoration process or on an as-needed basis. Table 5-1 provides a schedule for community involvement activities.

TABLE 5-1
 Timeframe for Community Involvement Activities
St. Louis Ordnance Plant, Former Hanley Area

Activity	Timeframe
Ongoing contact with community members	Ongoing, as needed
Administrative Record and information repository	Update regularly when final documents become available
Community survey	Completion of the remedial investigation field activities
Fact sheets	Completion of vapor intrusion investigation; beginning of remedial investigation; completion of feasibility study and proposed plan; selection of remedy
Mailing list	After mailing fact sheets if undeliverable mail is returned; after public meeting
30-day public comment period and public notice	Upon completion of the proposed plan
Public meeting	During 30-day comment period
Responsiveness summary	Upon completion of the 30-day comment period and receipt of comments from stakeholders
Media advisories and news releases	To announce the availability of the proposed plan for review and comment; as needed to publicize important project-related information
Revise community involvement plan	As needed if significant changes to the community involvement program occur, but not less than every 5 years

SECTION 6

References

89th Regional Readiness Command. 2007. The Hanley Area of the Former St. Louis Ordnance Plant. Fact Sheet No. 2. U.S. Army Corps of Engineers. June 22.

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Appendix A
Executive Order

Presidential Documents

Title 3—

Executive Order 12898 of February 11, 1994

The President

Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations

By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered as follows:

Section 1-1.*Implementation.*

1-101. *Agency Responsibilities.* To the greatest extent practicable and permitted by law, and consistent with the principles set forth in the report on the National Performance Review, each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States and its territories and possessions, the District of Columbia, the Commonwealth of Puerto Rico, and the Commonwealth of the Mariana Islands.

1-102. *Creation of an Interagency Working Group on Environmental Justice.*

(a) Within 3 months of the date of this order, the Administrator of the Environmental Protection Agency (“Administrator”) or the Administrator’s designee shall convene an interagency Federal Working Group on Environmental Justice (“Working Group”). The Working Group shall comprise the heads of the following executive agencies and offices, or their designees: (a) Department of Defense; (b) Department of Health and Human Services; (c) Department of Housing and Urban Development; (d) Department of Labor; (e) Department of Agriculture; (f) Department of Transportation; (g) Department of Justice; (h) Department of the Interior; (i) Department of Commerce; (j) Department of Energy; (k) Environmental Protection Agency; (l) Office of Management and Budget; (m) Office of Science and Technology Policy; (n) Office of the Deputy Assistant to the President for Environmental Policy; (o) Office of the Assistant to the President for Domestic Policy; (p) National Economic Council; (q) Council of Economic Advisers; and (r) such other Government officials as the President may designate. The Working Group shall report to the President through the Deputy Assistant to the President for Environmental Policy and the Assistant to the President for Domestic Policy.

(b) The Working Group shall: (1) provide guidance to Federal agencies on criteria for identifying disproportionately high and adverse human health or environmental effects on minority populations and low-income populations;

(2) coordinate with, provide guidance to, and serve as a clearinghouse for, each Federal agency as it develops an environmental justice strategy as required by section 1-103 of this order, in order to ensure that the administration, interpretation and enforcement of programs, activities and policies are undertaken in a consistent manner;

(3) assist in coordinating research by, and stimulating cooperation among, the Environmental Protection Agency, the Department of Health and Human Services, the Department of Housing and Urban Development, and other agencies conducting research or other activities in accordance with section 3-3 of this order;

(4) assist in coordinating data collection, required by this order;

(5) examine existing data and studies on environmental justice;

(6) hold public meetings as required in section 5-502(d) of this order; and

(7) develop interagency model projects on environmental justice that evidence cooperation among Federal agencies.

1-103. *Development of Agency Strategies.* (a) Except as provided in section 6-605 of this order, each Federal agency shall develop an agency-wide environmental justice strategy, as set forth in subsections (b)-(e) of this section that identifies and addresses disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations. The environmental justice strategy shall list programs, policies, planning and public participation processes, enforcement, and/or rulemakings related to human health or the environment that should be revised to, at a minimum: (1) promote enforcement of all health and environmental statutes in areas with minority populations and low-income populations; (2) ensure greater public participation; (3) improve research and data collection relating to the health of and environment of minority populations and low-income populations; and (4) identify differential patterns of consumption of natural resources among minority populations and low-income populations. In addition, the environmental justice strategy shall include, where appropriate, a timetable for undertaking identified revisions and consideration of economic and social implications of the revisions.

(b) Within 4 months of the date of this order, each Federal agency shall identify an internal administrative process for developing its environmental justice strategy, and shall inform the Working Group of the process.

(c) Within 6 months of the date of this order, each Federal agency shall provide the Working Group with an outline of its proposed environmental justice strategy.

(d) Within 10 months of the date of this order, each Federal agency shall provide the Working Group with its proposed environmental justice strategy.

(e) Within 12 months of the date of this order, each Federal agency shall finalize its environmental justice strategy and provide a copy and written description of its strategy to the Working Group. During the 12 month period from the date of this order, each Federal agency, as part of its environmental justice strategy, shall identify several specific projects that can be promptly undertaken to address particular concerns identified during the development of the proposed environmental justice strategy, and a schedule for implementing those projects.

(f) Within 24 months of the date of this order, each Federal agency shall report to the Working Group on its progress in implementing its agency-wide environmental justice strategy.

(g) Federal agencies shall provide additional periodic reports to the Working Group as requested by the Working Group.

1-104. *Reports to the President.* Within 14 months of the date of this order, the Working Group shall submit to the President, through the Office of the Deputy Assistant to the President for Environmental Policy and the Office of the Assistant to the President for Domestic Policy, a report that describes the implementation of this order, and includes the final environmental justice strategies described in section 1-103(e) of this order.

Sec. 2-2. *Federal Agency Responsibilities for Federal Programs.* Each Federal agency shall conduct its programs, policies, and activities that substantially affect human health or the environment, in a manner that ensures that such programs, policies, and activities do not have the effect of excluding persons (including populations) from participation in, denying persons (including populations) the benefits of, or subjecting persons (including populations) to discrimination under, such programs, policies, and activities, because of their race, color, or national origin.

Sec. 3-3. Research, Data Collection, and Analysis.

3-301. Human Health and Environmental Research and Analysis. (a) Environmental human health research, whenever practicable and appropriate, shall include diverse segments of the population in epidemiological and clinical studies, including segments at high risk from environmental hazards, such as minority populations, low-income populations and workers who may be exposed to substantial environmental hazards.

(b) Environmental human health analyses, whenever practicable and appropriate, shall identify multiple and cumulative exposures.

(c) Federal agencies shall provide minority populations and low-income populations the opportunity to comment on the development and design of research strategies undertaken pursuant to this order.

3-302. Human Health and Environmental Data Collection and Analysis. To the extent permitted by existing law, including the Privacy Act, as amended (5 U.S.C. section 552a): (a) each Federal agency, whenever practicable and appropriate, shall collect, maintain, and analyze information assessing and comparing environmental and human health risks borne by populations identified by race, national origin, or income. To the extent practical and appropriate, Federal agencies shall use this information to determine whether their programs, policies, and activities have disproportionately high and adverse human health or environmental effects on minority populations and low-income populations;

(b) In connection with the development and implementation of agency strategies in section 1-103 of this order, each Federal agency, whenever practicable and appropriate, shall collect, maintain and analyze information on the race, national origin, income level, and other readily accessible and appropriate information for areas surrounding facilities or sites expected to have a substantial environmental, human health, or economic effect on the surrounding populations, when such facilities or sites become the subject of a substantial Federal environmental administrative or judicial action. Such information shall be made available to the public, unless prohibited by law; and

(c) Each Federal agency, whenever practicable and appropriate, shall collect, maintain, and analyze information on the race, national origin, income level, and other readily accessible and appropriate information for areas surrounding Federal facilities that are: (1) subject to the reporting requirements under the Emergency Planning and Community Right-to-Know Act, 42 U.S.C. section 11001-11050 as mandated in Executive Order No. 12856; and (2) expected to have a substantial environmental, human health, or economic effect on surrounding populations. Such information shall be made available to the public, unless prohibited by law.

(d) In carrying out the responsibilities in this section, each Federal agency, whenever practicable and appropriate, shall share information and eliminate unnecessary duplication of efforts through the use of existing data systems and cooperative agreements among Federal agencies and with State, local, and tribal governments.

Sec. 4-4. Subsistence Consumption of Fish and Wildlife.

4-401. Consumption Patterns. In order to assist in identifying the need for ensuring protection of populations with differential patterns of subsistence consumption of fish and wildlife, Federal agencies, whenever practicable and appropriate, shall collect, maintain, and analyze information on the consumption patterns of populations who principally rely on fish and/or wildlife for subsistence. Federal agencies shall communicate to the public the risks of those consumption patterns.

4-402. Guidance. Federal agencies, whenever practicable and appropriate, shall work in a coordinated manner to publish guidance reflecting the latest scientific information available concerning methods for evaluating the human health risks associated with the consumption of pollutant-bearing fish or

wildlife. Agencies shall consider such guidance in developing their policies and rules.

Sec. 5-5. *Public Participation and Access to Information.* (a) The public may submit recommendations to Federal agencies relating to the incorporation of environmental justice principles into Federal agency programs or policies. Each Federal agency shall convey such recommendations to the Working Group.

(b) Each Federal agency may, whenever practicable and appropriate, translate crucial public documents, notices, and hearings relating to human health or the environment for limited English speaking populations.

(c) Each Federal agency shall work to ensure that public documents, notices, and hearings relating to human health or the environment are concise, understandable, and readily accessible to the public.

(d) The Working Group shall hold public meetings, as appropriate, for the purpose of fact-finding, receiving public comments, and conducting inquiries concerning environmental justice. The Working Group shall prepare for public review a summary of the comments and recommendations discussed at the public meetings.

Sec. 6-6. *General Provisions.*

6-601. *Responsibility for Agency Implementation.* The head of each Federal agency shall be responsible for ensuring compliance with this order. Each Federal agency shall conduct internal reviews and take such other steps as may be necessary to monitor compliance with this order.

6-602. *Executive Order No. 12250.* This Executive order is intended to supplement but not supersede Executive Order No. 12250, which requires consistent and effective implementation of various laws prohibiting discriminatory practices in programs receiving Federal financial assistance. Nothing herein shall limit the effect or mandate of Executive Order No. 12250.

6-603. *Executive Order No. 12875.* This Executive order is not intended to limit the effect or mandate of Executive Order No. 12875.

6-604. *Scope.* For purposes of this order, Federal agency means any agency on the Working Group, and such other agencies as may be designated by the President, that conducts any Federal program or activity that substantially affects human health or the environment. Independent agencies are requested to comply with the provisions of this order.

6-605. *Petitions for Exemptions.* The head of a Federal agency may petition the President for an exemption from the requirements of this order on the grounds that all or some of the petitioning agency's programs or activities should not be subject to the requirements of this order.

6-606. *Native American Programs.* Each Federal agency responsibility set forth under this order shall apply equally to Native American programs. In addition, the Department of the Interior, in coordination with the Working Group, and, after consultation with tribal leaders, shall coordinate steps to be taken pursuant to this order that address Federally-recognized Indian Tribes.

6-607. *Costs.* Unless otherwise provided by law, Federal agencies shall assume the financial costs of complying with this order.

6-608. *General.* Federal agencies shall implement this order consistent with, and to the extent permitted by, existing law.

6-609. *Judicial Review.* This order is intended only to improve the internal management of the executive branch and is not intended to, nor does it create any right, benefit, or trust responsibility, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies, its officers, or any person. This order shall not be construed to create any right to judicial review involving the compliance or noncompliance

of the United States, its agencies, its officers, or any other person with this order.

William J. Clinton

THE WHITE HOUSE,
February 11, 1994.

Appendix B
Community Involvement Outreach Materials



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY 89TH REGIONAL READINESS COMMAND
3130 GEORGE WASHINGTON BOULEVARD
WICHITA, KANSAS 67210-1598

REPLY TO
ATTENTION OF:

Environmental Division

17 September 2007

Dear Homeowner or Occupant,

In accordance with our letter of June 2006 the 89th Regional Readiness Command (RRC), in conjunction with the Environmental Protection Agency (EPA) and the Missouri Department of Natural Resources (MDNR), is continuing an environmental investigation at the Sverdrup Army Reserve Center located at 4301 Goodfellow Boulevard in St. Louis, Missouri. This property was a production area of the former St. Louis Ordnance Plant. Information gathered during this investigation indicates that contaminants have been released to the groundwater in the vicinity of the Army Reserve Center. The 89th RRC is continuing efforts to determine the extent and impact of this groundwater contamination.

As part of this project, the Army will be working with a contractor to collect soil-gas samples from properties located near the contaminated groundwater. Soil-gas analytical results will contribute valuable information that will help the Army determine if groundwater contamination may be impacting nearby residents.

In the next few months, the Army will be working to coordinate access to private property in the area for the purpose of taking environmental samples. The Corps of Engineers, Kansas City District, will be contacting those residents and property owners whose properties will require environmental sampling.

If you have any questions or concerns, please call Mr. William Titterington of the 89th RRC at 316-681-1759, x1469.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Fenili".

John A. Fenili
Facility Management Officer



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY 89TH REGIONAL READINESS COMMAND
3130 GEORGE WASHINGTON BOULEVARD
WICHITA, KANSAS 67210-1598

REPLY TO
ATTENTION OF:

June 7, 2006

Environmental Division

XXXXXX
XXXX Stratford Avenue
St. Louis, Missouri 63120

Dear Homeowner or Occupant,

The 89th Regional Readiness Command (RRC), in conjunction with the Environmental Protection Agency (EPA) and the Missouri Department of Natural Resources (MDNR), has been removing abandoned buildings and conducting environmental investigations at Sverdrup Army Reserve Center located at 4301 Goodfellow Boulevard. This property was a production area of the former St. Louis Ordnance Plant. The purpose of the environmental investigation is to determine if pollutants were released to the soil or groundwater during the former ordnance plant's operations. As part of this project, the U.S. Army Corps of Engineers, Kansas City District will be taking samples along Goodfellow Boulevard and Stratford and Henner Avenues to determine if pollutants are present outside the boundaries of the 89th RRC property.

During the week of July 10, 2006, the Corps of Engineers will be conducting tests and collecting samples on city right-of-ways in your neighborhood. Right-of-ways that may be used for this work include streets, curbs, alleys, sidewalks and the grassy area between the sidewalk and curb. Parking along Stratford Avenue, Henner Avenue and Goodfellow Boulevard may be temporarily unavailable during the daytime hours due to vehicles and equipment used for the sampling.

We apologize for any inconvenience this may cause you but we hope the brief duration of testing activities will result in minimum inconvenience to you. Sampling locations will be restored to their pre sample condition. If any additional actions or activities are required you will be contacted prior to any work being conducted.

If you have any questions or concerns, please call Mr. William Titterington of the 89th RRC at 316-681-1759, x1469. Representatives of the 89th RRC and the Missouri Department of Natural Resources met with Alderman Jeffrey Boyd, your Ward 22 representative, and briefed him on the upcoming field work. He is also available to address your questions or concerns. Alderman Boyd can be reached at 314-622-3287.

Sincerely,

John A. Fenili
Facility Management Officer

NOTICE OF AVAILABILITY

Fall 2007

INFORMATION AVAILABLE FOR THE HANLEY AREA OF THE FORMER ST. LOUIS ORDNANCE PLANT

The Hanley Area of the former St. Louis Ordnance Plant lies approximately three miles west of the Mississippi River and 0.25 miles south of the intersection of I-70 and Goodfellow Boulevard. It is a Department of Defense property and it is eligible for environmental clean up activities. The first step in this process is to investigate the soil and groundwater, which could potentially be contaminated with metals, explosives and volatile organic compounds. The information gathered from this investigation will be put in the local library along with other important documents.

**The Administrative Record File is available for
public review at the following location:**

St. Louis Central Public Library
1301 Olive Street
St. Louis, Missouri 63103
314-241-2288
(Copies of documents may be transferred to other
St. Louis Public Library branches throughout the
city upon request.)

**For further information on the cleanup of this
site, please contact:**

William Stayer, Program Manager
U.S. Army Environmental Center
Cleanup Division, Oversight North Branch
5179 Hoadley Road
Aberdeen Proving Ground, Maryland 21010-5401
William.stayer@aec.apgea.army.mil
410-436-1606

or

Mitch Frazier, Public Affairs Officer
U.S. Army Corps of Engineers
601 East 12th Street
Kansas City, Missouri 64106
Mitchell.d.frazier@usace.army.mil
816-983-3486

Appendix C
March 2008 Questionnaire



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY 89TH REGIONAL READINESS COMMAND
3130 GEORGE WASHINGTON BOULEVARD
WICHITA, KANSAS 67210-1598

REPLY TO
ATTENTION OF:

March 28, 2008

Name
Address 1
Address 2

Dear Mr./Ms. :

The Army is committed to protecting the environment. As part of this commitment, the Army is conducting environmental investigation and restoration activities at the Hanley Area of the former St. Louis Ordnance Plant. The Sverdrup Army Reserve Center, located at 4301 Goodfellow Boulevard, is located adjacent to the former Hanley Area. The Army funds and implements environmental programs through the Installation Restoration Program, a U.S. Department of Defense initiative to identify, evaluate, and clean up former disposal and spill sites at military facilities nationwide.

An important part of this effort is to understand the community's concerns, make sure that the community is informed, and provide opportunities to participate in the decision-making process. To accomplish this, the Army is developing a document called a "Community Involvement Plan." This document identifies community concerns and describes how the Army will communicate with the public about environmental activities at the Hanley Area of the former St. Louis Ordnance Plant.

We need your help. To update the Community Involvement Plan, we need to hear directly from residents who live near the facility. We have prepared the enclosed survey to help us understand your concerns about environmental activities at the Hanley Area of the former St. Louis Ordnance Plant. The results of this survey will help us keep the public better informed about current and future environmental projects, and identify ways that community members can provide input into the overall cleanup process.

Please take a few minutes to fill it out and send it back to us in the enclosed postage-paid envelope. Survey responses should be received no later than April 11, 2008. Your survey responses will be kept strictly confidential and results will be used in a summary format to update the Community Involvement Plan.

If you have any questions, please contact William Titterington, Community Involvement Coordinator at 316-681-1759, extension 1469. Thank you for your valuable insight and your time.

Sincerely,

John A. Fenili
Facility Management Officer
89th Regional Readiness Command
United States Army Reserve

Enclosure

**Former St. Louis Ordnance Plant – Hanley Area
Installation Restoration Program – Community Involvement Plan
Community Questionnaire
March 2008**

Name: _____

Address: _____

Telephone: (Optional) _____

1. The Army has been conducting environmental investigation and restoration activities at the Hanley Area of the former St. Louis Ordnance Plant. The Sverdrup Army Reserve Center, located at 4301 Goodfellow Boulevard, is located adjacent to the former Hanley Area. Are you aware of Army environmental programs at the facility?

Yes No

If yes, please describe:

2. Do you have any specific concerns about environmental issues related to Army operations at the Hanley Area of the former St. Louis Ordnance Plant? The Sverdrup Army Reserve Center, located at 4301 Goodfellow Boulevard, is located adjacent to the former Hanley Area.

Yes No

If yes, please describe:

3. Are you concerned about other environmental issues that affect your neighborhood?

Yes No

If yes, please describe:

4. Would you be interested in learning more about the Army's environmental programs at the Hanley Area of the former St. Louis Ordnance Plant? The Sverdrup Army Reserve Center, located at 4301 Goodfellow Boulevard, is located adjacent to the former Hanley Area.

Yes No

5. If you answered "yes" to Question 4, how do you prefer to receive information? Check all that apply:

Fact sheets

Newspaper articles

Television news

Radio news

Newspaper public notices as required by project milestones

Formal public meetings as required by project milestones

Information maintained at a local information repository

Army website

Other (Please describe):

6. What newspapers, television stations, radio stations and websites do you rely on for local news?

7. Would you like to be added to the Army's mailing list for the Hanley Area of the former St. Louis Ordnance Plant? The Sverdrup Army Reserve Center, located at 4301 Goodfellow Boulevard, is located adjacent to the former Hanley Area. If you mark yes, please be sure to provide complete mailing address at space provided at the beginning of questionnaire.

Yes No

8. Additional comments:

Appendix D
Key Contacts List

APPENDIX D

Key Contact List

St. Louis, Missouri Officials

Contact	Address	Telephone Number
Mayor Francis Slay	Mayors Office City Hall, Room 200 1200 Market Street St. Louis, MO 63103	Phone: 314-622-3201
Board of Alderman Lewis Reed, President	City Hall, Room 230 1200 Market Street St. Louis, MO 63103	Phone: 314-622-4114
Board of Alderman, Ward 22 – Jeffrey Boyd	City Hall, Room 230 1200 Market Street St. Louis, MO 63103	Phone: 314-662-3287
Director of Public Utilities/Water Commissioner David Visintainer	1640 South Kingshighway Boulevard St. Louis, MO 63110	Phone: 314-633-9000
Director of Public Safety Charles Bryson	City Hall, Room 401 1200 Market Street St. Louis, MO 63103	Phone: 314-622-3391

State of Missouri Officials

Contact	Address	Telephone Number
Governor Matt Blunt	Missouri Capital Building Room 218 PO Box 720 Jefferson City, MO 65104	Phone: 573-751-3222
State Senator District 4 – Jeff Smith	4515 Olive, Suite 210 St. Louis, MO 63108	Phone: 314-361-4333
State Representative District 4 – Mike Thomson	PO Box 44 Maryville, MO 64468	Phone: 660-582-4494
Attorney General Jeremiah Nixon	Missouri Attorney General's Office Wainwright State Office Building 111 N. 7th Street, Suite 204 St. Louis, MO 63101	Phone: 314-340-6816
Missouri Department of Natural Resources (MDNR) Jim Harris	Federal Facilities Section, HWP 1730 E. Elm Street Jefferson City, MO 65101	Phone: 573-751-3907

Federal Officials

Contact	Address	Telephone Number
US Senator(s) Claire McCaskill	United States Senate Washington, DC 20510	Phone: 202-224-6154
Christopher Bond	7700 Bonhomme, #615 St. Louis, MO 63104	Phone: 314-725-4484
US Representative(s) William Clay, Jr.	625 North Euclid Avenue, Suite 200 St. Louis, MO 63108	Phone: 314-367-1970
Russ Carnahan	7370 Manchester, Suite 20 St. Louis, MO 63143	Phone: 314-534-2004
89th Regional Readiness Command U.S. Army Reserve Chief, Environmental Division William S. (Tex) Titterington	HQ, 89th Regional Readiness Command Attn: AFRC-CKS-ENE 3130 George Washington Boulevard Wichita, Kansas 67210-1598	Phone: 316-618-1759
NWK – USACE, KC District Project Manager Josephine Newton-Lund	USACE CENWK-PM-EP 601 East 12th Street Kansas City, MO 64106	Phone: 816-389-3912
U.S. Army Environmental Command (USAEC) Project Manager Andrew Maly	USAEC Attn: Andrew Maly SFIM-AEC-CD Building E4480 Beal Road APG-EA, MD 21010	Phone: 410-436-1611
United States Environmental Protection Agency Region 7 (USEPA) Thomas Lorenz	901 North 5th Street Kansas City, KS 66101	Phone: 913-551-7292

Community Stakeholders

Contact	Address	Telephone Number
St. Louis Regional Chamber and Growth Association President – Dick Fleming	One Metropolitan Square Suite 1300 St. Louis, MO 63102	Phone: 314-444-1100
CH2M HILL Task Manager Dan Price	727 North First Street Suite 400 St. Louis, MO 63102	Phone: 314-421-0900

News Media

Contact	Address	Telephone Number
Newspaper		
St. Louis Post-Dispatch Steve Parker, Deputy Managing Editor	900 N. Tucker Boulevard St. Louis, MO 63101	Phone: 314-340-8290
St. Louis American Alvin A. Reid, City Editor	4242 Lindell Boulevard St. Louis, MO 63108	Phone: 314-533-8000
Television		
KTVI FOX, Channel 2 Glen Siebold, Assignment Manager	5915 Berthold Avenue St. Louis, MO 63110	Phone: 314-644-7531 Fax: 314-644-7419
KMOV CBS, Channel 4 Lou Jakovic, Assignment Manager	One Memorial Drive St. Louis, MO 63102	Phone: 314-444-6333 Fax: 314-621-4775
KSDK NBC, Channel 5 Ed Rich, Assignment Manager	1000 Market Street Saint Louis, MO 63101	Phone 314-444.5125
Radio		
KMOX 1120 AM John Butler, News Director	One Memorial Drive St. Louis, MO 63102	Phone: 314-444-3232
KWMU 92.7 FM Bill Raak, News Director	One University Boulevard St. Louis, MO 63121	Phone: 314-516-5968