

FUSRAP

FORMERLY UTILIZED SITES REMEDIAL ACTION PROGRAM OVERSITE AND MONITORING COOPERATIVE AGREEMENT Fourth Quarter: October through December 2013 Report



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Missouri Department of Natural Resources

FUSRAP Staff and Contact Information

FUSRAP Project Staff

Daniel Carey
FUSRAP North County and St. Louis Downtown
Site Project Coordinator (Florissant Field Office)

Rita Alexander
Florissant Field Services Manager

Eric Gilstrap, PE
Environmental Engineer
(Florissant Field Office Manager,
FUSRAP Historical Support, other projects)

Patrick Anderson, PE
Environmental Engineer
(FUSRAP technical support, document coordinator
and records management, other projects)

Contact Information
daniel.carey@dnr.mo.gov
314-877-3047

rita.alexander@dnr.mo.gov
314-877-3046

eric.gilstrap@dnr.mo.gov
314-877-3250

patrick.anderson@dnr.mo.gov
573-751-3087

Other Staff

David J. Lamb
Director – Hazardous Waste Program

Branden Doster, PE
Federal Facilities Section Chief

Tiffany Drake, PE
Remediation and Radiological Assessment Unit Chief

Ramona Huckstep
Community Involvement Coordinator

Contact Information
david.lamb@dnr.mo.gov
573-751-3176

branden.doster@dnr.mo.gov
573-526-2739

tiffany.drake@dnr.mo.gov
573-526-9830

ramona.huckstep@dnr.mo.gov
573-522-1540

Missouri Department of Natural Resources Contact Information

Hazardous Waste Program
P.O. Box 176
Jefferson City, MO 65102-0176
573-751-3907
573-526-5268 FAX

Florissant Field Office
917 N. Hwy. 67 Suite 104
Florissant, MO 63031
314-877-3250
314-877-3254 FAX

Cover Photo: Remediation of the St. Louis Airport Site (SLAPS) Vicinity Property Ballfields Phase 2B proceeded during the quarter. U.S. Army Corps of Engineers contractors were excavating west of Coldwater Creek in the area across McDonnell Boulevard from the SLAPS. Ballfields Phase 2B will continue in the next quarter.

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Another view of the Ballfields Phase 2B excavation work is shown. USACE was analyzing samples from this excavation to determine the scope of any additional work needed.

History of Formerly Utilized Sites Remedial Action Program Sites

The St. Louis Downtown Site (SLDS) processed uranium for the nation's early atomic energy program. In 1946, federal agencies began using the St. Louis Airport Site (SLAPS) as a storage area for radioactive wastes and processed residues, the majority of which originated at the SLDS. Methods of storage at the SLAPS included both uncovered bulk storage piles and materials containerized in drums.

In 1966 the materials at the SLAPS were sold by the Atomic Energy Commission and were shipped to the facility at 9200 Latty Ave.,* where the majority of the material was dried and shipped to out-of-state processing facilities. 8,700 tons of radioactively contaminated barium sulfate processed waste were mixed with 39,000 tons of soil and disposed of at West Lake Landfill in 1973. West Lake Landfill is being addressed separately from the formerly utilized sites remedial action program, or FUSRAP.

Processing, transportation, storage and management practices during this period led to the contamination of the three major FUSRAP sites: SLDS, SLAPS and the Hazelwood Interim Storage Site, or HISS*, with the latter two sites being placed on the National Priorities List (NPL) in 1989. In addition, approximately 78 contaminated vicinity properties have been identified as SLAPS Vicinity Properties (VPs). The total estimated volumes of contaminated soils, sediments and debris were estimated to have been about 1.1 million cubic yards.

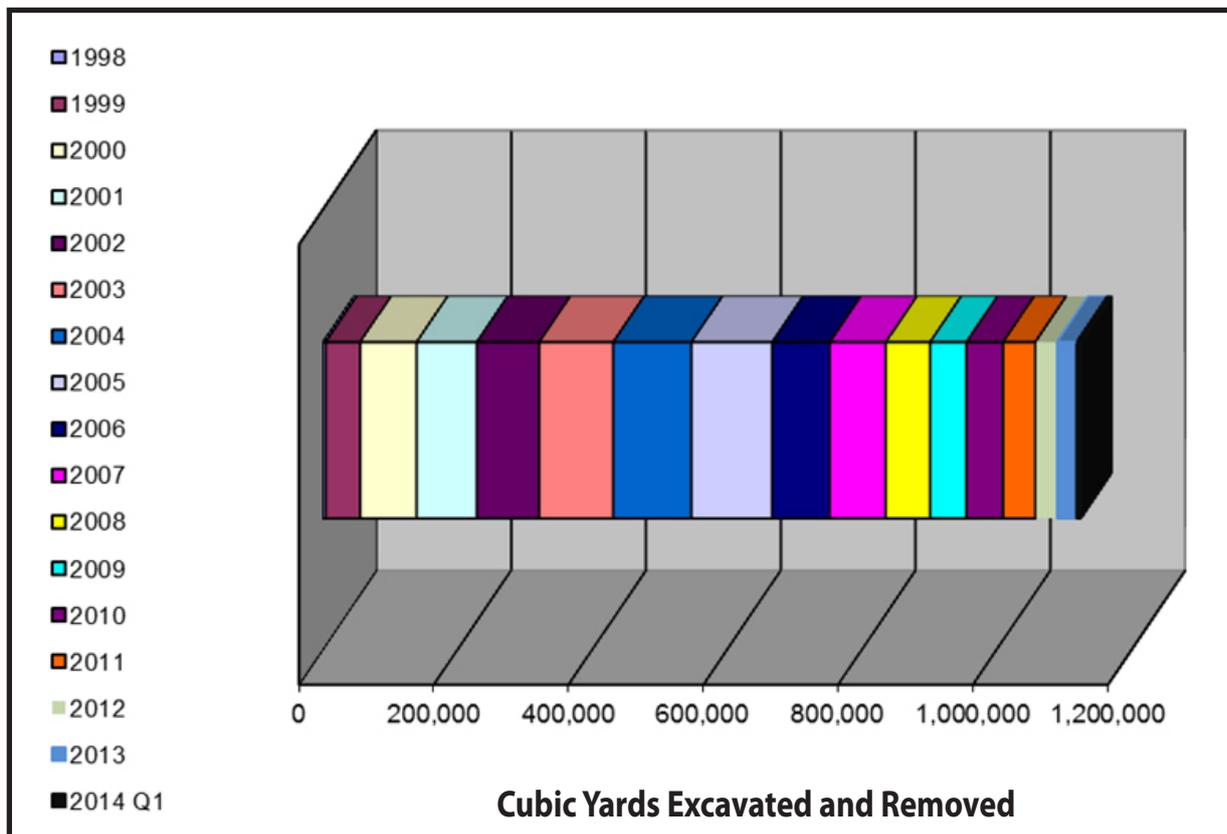
On Oct. 13, 1997, the Energy and Water Appropriations Bill transferred the responsibility for FUSRAP from the Department of Energy to the United States Army Corps of Engineers (the Corps).

*The business and property at 9200 Latty Ave. are referred to as Futura in this and other reports. Although the company Futura no longer operates at the property, the property is listed on the NPL list under this nickname. The Hazelwood Interim Storage Site (HISS) is located just east of Futura. The two adjacent properties are referred to collectively as HISS/Futura.

Work Completed This Quarter

	SPECIFIC SITE	WORK DESCRIPTION
North County (NC)	SLAPS Vicinity Properties	Ballfields Phase 2 excavation work was completed during the quarter. The Ballfields are north of McDonnell Boulevard, between Eva Road and Coldwater Creek. Ballfields Phase 2B work continued. The volume of soil removed from all the vicinity properties this quarter was about 1,238 cubic yards.
	HISS/Futura and Latty Ave. Vicinity Properties	Most remediation work has been completed on these properties, although final documentation of the status of these sites has not yet been done. No soil or debris was shipped from these properties during the quarter.
SLDS	Downtown Vicinity Properties and SLDS	Building 101 excavation at Plant 6 West Half continued during the quarter. Remedial activities at DT-2 (City Property), east of the levee, continued during the quarter. Remediation of the Kiesel Hall Street Property continued during the quarter. This work needed to be expanded beyond the boundaries of the Kiesel property. The volume of soil removed from St. Louis Downtown Sites in this quarter was about 6,527 cubic yards.
NON-SITE SPECIFIC		Three utility support operations were undertaken by the Corps during the quarter. The total volume of soil or debris removed this quarter for the entire St. Louis FUSRAP project was about 7,765 cubic yards. (For reference, during Federal Fiscal 2013 about 28,870 cubic yards of material was removed from all St. Louis FUSRAP project sites.)

St. Louis FUSRAP Project Soil and Debris Removal 1998-Present



Years and quarters on this chart are based on the federal fiscal year, which is from Oct. 1 to Sept. 30.



Building 101 area soil excavation at SLDS continued during this quarter. The black material in the picture above helps manage erosion from snow and rain.

Work Performed by Department Personnel

Document Reviews

The Federal Facilities Section provides technical review for major decision documents, work plans, pre-design investigation reports, remedial designs, and post remedial action reports. Comments are submitted to the Corps for response and become part of the public record. Listed below are documents reviewed by the department during this quarter and documents previously reviewed for which some resolution of comments occurred or is pending.

1. Proposed Plan for No Further Action for the Accessible Soil Operable Unit Associated with Group 1 Properties at the St. Louis Downtown Site, Draft Final, dated Sept. 23, 2013

The department commented on the revision of this draft document. The department requested clarification regarding the Corps analysis of properties they deemed to need “no-further action” and an explanation as to whether this interpretation would satisfy the expectation for “unlimited use and unrestricted exposure.” The department also requested clarification of an explanatory statement about groundwater not being used for drinking water. Project management staff asked for additional areas to be added to a graphic regarding historical processing. The Missouri Department of Health and Senior Services (DHSS) requested additional information regarding residential risk assessment scenarios for levee properties included for no further action. Staff transmitted these comments in a letters dated Oct. 8, and Dec. 4.

2. Pre-Design Investigation Work Plan Byassee Properties, St. Louis North County Sites, Revision B, dated Sept. 24, 2013

The department informed Corps there were no comments for this draft plan in a letter dated Oct. 31, 2013.

3. Pre-Design Investigation Work Plan for Coldwater Creek from Frost Avenue to St. Denis Bridge, Revision B, dated Dec. 18, 2013

The department received this draft work plan Dec. 18, 2013; it is currently being reviewed.

Site Observations

Field personnel conduct site visits to observe and document the status of remedial actions, environmental monitoring, contaminant migration prevention and pre-design investigations. U.S. Army Corps of Engineers personnel are immediately notified of findings and reports are filed for public record and are available upon request.

The following site visits were conducted on these dates during this quarter:

SPECIFIC SITE	OCT.	NOV.	DEC.
NORTH COUNTY SITES (HISS/Futura, SLAPS and Vicinity properties)	Oct. 3 Oct. 17	Nov. 13	Dec. 4 Dec. 10 (1/14)
SLDS	Oct. 3 Oct. 17		(1/16)

***All departmental comments and site visit reports are available upon request.**

Sampling

Samples are obtained by department personnel and shipped to a contract laboratory for analysis. The purposes of sample collection include confirmation of results from remedial actions, stormwater controls or treatment and investigating locations of potential concern.

The Corps Coldwater Creek Bi-Annual Sampling

The department observed the Corps' contractor bi-annual sampling in Coldwater Creek on Oct. 17. These samples are taken to show, on a continuing basis, the Corps remediation work on properties in North County is not adversely impacting the creek. Six locations were sampled by the contractor between SLAPS and Pershall Road. Split water and sediment samples were obtained by the department for analysis at three of these locations; State results are available upon request.

Community Relations

Department personnel are available for questions, requests for information, or as a means of submitting comments and concerns. It is our goal to encourage community involvement and ensure the concerns of the citizens of Missouri are addressed. Special requests regarding field oversight, research and presentations are welcome. Ramona Huckstep, the Community Involvement Coordinator, is available for assistance at 573-522-1540.

Oversight Committee

The St. Louis Sites Oversight Committee last met April 25 at 7 p.m. at the James J. Eagan Civic Center. The Corp's FUSRAP Project Manager, Sharon Cotner, gave an update about current remediation work and discussed the history of the sites. The Corps also encouraged residents living within the Coldwater Creek floodplain between Frost Ave. and St. Denis Bridge to sign up to allow for sampling on their property. EPA Project Manager, Matt Jefferson, discussed a recent gamma scan flyover of Coldwater Creek. Agency for Toxic Substances and Disease Control gave a presentation about cancer and the environment. DHSS staff discussed their analysis of cancer incidence data in the area. All the agencies were present to answer questions before and after the formal presentations.

The time and location of the next meeting will be announced in our next quarterly report. The meeting to be held Oct. 24 at the Hazelwood Civic Center had to be cancelled due to continuing uncertainty whether key federal government stakeholders such as the Corps and EPA would be able to attend. If you wish to be added to the notification list for these meetings, contact either Sandy Delcoure at sdelcoure@sbcglobal.net, or Ramona Huckstep, Missouri Department of Natural Resources at 573-522-1540.

Regulators Coordination Meeting

Personnel from EPA, Corps and the department periodically meet in person and by conference call to discuss site status, document schedules, landowner assistance projects and other similar issues. These coordination meetings are beneficial, as they keep the parties informed about site status, allow for discussion of cleanup issues and provide coordination of agency activities as they relate to cleanup of the sites. Meetings were only held Nov. 13, Nov. 27 and Dec. 4 during this quarter, due to holidays and schedule problems stemming from the federal government shutdown.

Site Activities

North County

U.S. Army Corps of Engineers Remedial Actions

- Ballfields Phase 2 excavation work was completed during the quarter; Ballfields Phase 2B excavation work continued.
- Characterization sampling of Byassee Road began during the quarter.
- VPs 1, 2, 7, 13, 14, 15 and IA-11 sampling were completed; soil sampling was completed at GKN Company and Boeing Company properties during the quarter.
- Sampling of Coldwater Creek between McDonnell Blvd. and Frost Ave. was completed during the quarter; characterization sampling of Coldwater Creek between Frost Ave. and St. Denis Bridge began.

St. Louis Downtown Site

U.S. Army Corps of Engineers Remedial Actions

- Plant 6 (Mallinckrodt) - The Corps continued excavating underlying soil from the location formerly occupied by Building 101 during the quarter.
- Excavation and additional sampling at Kiesel Hall Street Property continued. The remediation grew beyond the approved bounds of the property. Contamination above remediation goals will need to be removed north towards a Gunther Salt property formerly owned by Morton Salt and east towards a property owned by St. Louis City. The project scope was enlarged to address these properties.
- DT-2 (City Property) - Excavation east of the levee in Area 7 resumed during the quarter.



The department observed characterization sampling of Coldwater Creek on Jan. 16. Soil samples were taken on the west bank of the creek, south of the Pershall Road bridge.

Tasks and Goals for Next Quarter

North County

- The Corps will continue remediation at the IA-9 Ballfields area phase 2B. The Corps sampling of Coldwater Creek from Frost Avenue to St. Denis Bridge will also continue.
- Missouri Department of Natural Resources will obtain split samples of soil and sediment from the Corps contractor's ongoing Coldwater Creek sampling. This is tentatively scheduled to be held in the next quarter.

St. Louis Downtown Site

- The Corps - remediation of DT-2 (City Property) will continue. This work is currently expected to be completed in mid-2016.
- The Corps - Plant 6/Building 101 area soil excavation will continue. This work is currently expected to be completed mid-2015.
- The Corps - Kiesel Hall Street surrounding area remediation will continue.

Document Reviews

Review of the following documents and data are anticipated during the next quarter.

North County

- Community Involvement Plan for all St. Louis Sites
- North County Site Wide Remedial Design and Remedial Action Work Plan
- Coldwater Creek Frost to St. Denis Bridge Pre-Design Investigation Work Plan

St. Louis Downtown Site

- Inaccessible Soils Operable Proposed Plan and Record of Decision
- Building 101 and Destrehan Street Explanation of Significant Difference - Review only; no comments will be made on this document

Site Observations and Sampling

Our on-going role in providing site observations and sampling investigations will continue as in previous quarters.

Department Projects

Staff will continue to work on committees affiliated with long-term stewardship, groundwater and the five year review.

Long-Term Stewardship Committee

Long-term stewardship applies to sites and properties where long-term management of contaminated environmental media is necessary to protect human health and the environment. This generally includes the establishment and maintenance of physical and legal controls, implementation entities, authorities, accountability mechanisms, information and data management systems, and other resources.

The need for long-term stewardship will exist for areas of inaccessible contamination at both the North St. Louis County and the Downtown Properties located under roads, railroads, buildings and other similar structures deemed by the current owners to be vital or in-use. It also exists for portions of the downtown site where remediation goals are deemed suitable for industrial uses.

Completion of the project is expected by 2016, and will be followed by a two-year transitional period as responsibility is shifted from the Corps to the U.S. Department of Energy. The goal of the committee is to begin developing long-term stewardship mechanisms as soon as possible. The department wants these mechanisms to be identified and in place so it can begin assessing their effectiveness prior to the transition.

Training, Conferences and Meetings Attended

TRAINING, CONFERENCE OR MEETING	DATES ATTENDED	DEPARTMENTAL STAFF WHO ATTENDED
Hazardous Waste Program, Federal Facilities section meetings*	Oct. 23, Dec. 9	Daniel Carey, Rita Alexander, Tiffany Drake, Eric Gilstrap, Branden Doster, Patrick Anderson and Ramona Huckstep
Cyber-Security Training	Nov. 7	Daniel Carey, Rita Alexander
Regulator conference calls	Nov. 13, Nov. 27, Dec. 4	Daniel Carey, Tiffany Drake, Branden Doster and Ramona Huckstep
FUSRAP-SLDS Status Meeting	Sept. 11	Daniel Carey
Medical Monitoring	Oct. 22	Daniel Carey
Cooperative Agreement Meeting	Nov. 20	Daniel Carey, Branden Doster and Tiffany Drake
EPA-DNR FUSRAP Project Meeting	Nov. 21	Daniel Carey
Hazardous Waste Program Meeting	Dec. 13	Daniel Carey, Tiffany Drake, Branden Doster and Ramona Huckstep
SLDS Proposed Plan Comment Resolution	Dec. 18	Daniel Carey and Tiffany Drake

* U.S. Army Corps of Engineers Cooperative Agreement funds were not used for all of the staff listed as participating in this training or meeting.

Financial Reporting

The department's Hazardous Waste Program submits a financial report separate from this document. The report includes costs incurred during the reporting period with request for reimbursement forms.