

FUSRAP

FORMERLY UTILIZED SITES REMEDIAL ACTION PROGRAM OVERSIGHT AND MONITORING COOPERATIVE AGREEMENT

3rd Quarter: July through September 2014 Report



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Missouri Department of Natural Resources

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COVER PHOTO: USACE contractor bi-annual sampling of Coldwater Creek on October 7 observed by the Department; two permanent additional sampling locations downstream were added for this sampling event.

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VP57/58 work continued in North County, southwest of the Coldwater Creek crossing at Pershall Road.

History of the Formerly Utilized Sites Remedial Action Program Sites

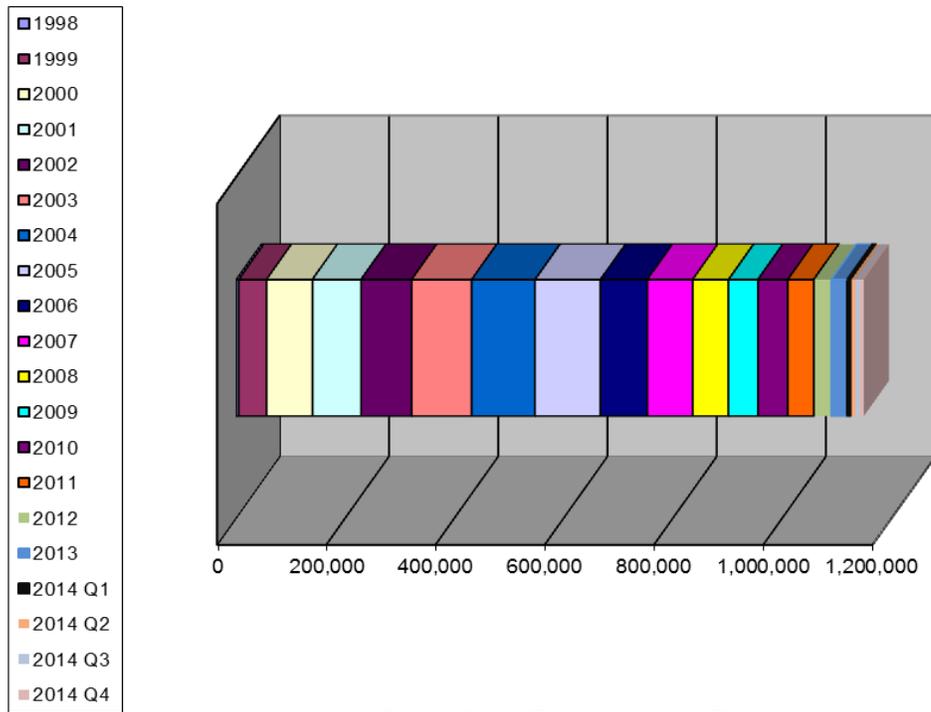
The St. Louis Downtown Site (SLDS) processed uranium for the nation's early atomic energy program. In 1946, the U.S. Department of Energy's (DOE) predecessor agencies began utilizing the St. Louis Airport Site (SLAPS) as a storage area for radioactive wastes and processed residues, the majority of which 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 (AEC) and were shipped to a facility at 9200 Latty Avenue (Futura), 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 FUSRAP.)

Processing, transportation, storage, and management practices during the above-stated period led to the contamination of the three major FUSRAP sites: SLDS, SLAPS, and the Hazelwood Interim Storage Site (HISS)/Futura, 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 October 13, 1997, the Energy & Water Appropriations Bill transferred the responsibility for the remediation of FUSRAP properties from the DOE to the U. S. Army Corps of Engineers (USACE).

Status of Work Completed This Quarter

MAJOR AREA	SPECIFIC SITES	WORK DESCRIPTION
North County (NC)	SLAPS Vicinity Properties	Pershall Avenue Right of Way sampling and Coldwater Creek Vicinity Property from Frost Ave. to St. Denis sampling continued during the quarter. Sampling and remediation of portions of VP57 and VP58 continued during the quarter. The volume of soil removed from the vicinity properties this quarter was about 655 yd ³ .
North County (NC)	HISS/Futura and Latty Ave. Vicinity Properties	Most remediation work has been completed on these properties, although final documentation of this status has not yet been completed. No soil or debris was shipped from these properties during the quarter.
Saint Louis Downtown Sites (SLDS)	Saint Louis Downtown Site and Vicinity Properties	Building 101 excavation at Plant 6 West Half continued during the quarter. Remedial activities at DT-2 (City Property) east of the levee was completed during the quarter. Expanded work in areas adjoining the Kiesel property was completed during the quarter. The volume of soil removed from St. Louis Downtown Sites in this quarter was about 6,931 yd ³ .
NON-SITE SPECIFIC		Six utility support operations were undertaken by the USACE during the quarter. The total volume of soil and debris removed this quarter for the entire St. Louis FUSRAP project was about 7,586 yd ³ . (For reference, during Federal Fiscal Year 2013 about 28,870 yd ³ of material was removed from all St. Louis FUSRAP project sites.)



Cubic Yards Excavated and Removed

Years and quarters on this chart are based on the Federal Fiscal Year (FFY). For example, FFY 2014 is October 1, 2013, through September 30, 2014.

Work Performed by Department Personnel

DOCUMENT REVIEWS

The Missouri Department of Natural Resources' Federal Facilities Section (FFS) provides technical review on major decision documents, work plans, pre-design investigation reports, remedial designs, and post remedial action reports.

Comments are submitted to the USACE for response and become part of the public record. Listed below are both documents reviewed by the Department during this quarter and documents previously reviewed for which some resolution of comments occurred or is pending.

1. "Record of Decision for the Inaccessible Soil Operable Unit Associated with Group 1 Properties at the St. Louis Downtown Sites," Revision B, dated March 27, 2014.

The Department requested additional clarification regarding an apparent discrepancy between the proposed plan and record of decision regarding DT-8 sewer lines on May 30, 2014. USACE satisfactorily explained the discrepancy and is considering our comments for the final record of decision. This item is still pending receipt of the final record of decision.

2. "Post-Remedial Action Report / Final Status Survey Evaluation for the Latty Avenue Vicinity Property Futura," Revision B, dated June 27, 2014.

The Department requested clarification on inaccessible contamination left in place at utility poles. We requested USACE document sewer and video inspection equipment inspections or provide a reference, asked for further explanatory text, and requested correction of minor calculation discrepancies. DHSS asked for responses to technical questions regarding the RESRAD runs.

DOCUMENT REVIEWS (CONTINUED)

3. **“Post Remedial Action Report and Final Status Survey Evaluation for the Accessible Soils within the St. Louis Downtown Site Vicinity Property Burlington Northern Santa Fe Railroad (DT-12),” Revision B, dated June 27, 2014**

The Department requested information regarding what monitoring wells near DT-12 show with respect to the contaminant plumes, and the department requested clarification regarding language appearing to incorrectly indicate that ground water monitoring was not applicable to DT-12.

4. **“Pre-Design Investigation Work Plan for the St. Louis Airport Site Vicinity Properties VP 02(C), 03(C), 06(C), 07(C), and 08(C),” Revision B, dated May 1, 2014.**

The Department requested clarification on the definition of Coldwater Creek corridor used. The department asked for clarification regarding statements about the effect of omitting PB-210 from calculations in the North County Record of Decision.

5. **“Pre-Design Investigation Work Plan for the St. Louis Airport Site Vicinity Property Latty Avenue,” Revision B, dated May 8, 2014.**

The Department had no comments on this draft work plan.

6. **“Pre-Design Investigation Work Plan for the St. Louis Airport Site Vicinity Property Pershall Road,” Revision B, dated May 21, 2014.**

The Department requested further information on the source of the 10 year flood plain information used in the report. The department asked for an explanatory statement about why sampling east of Hazelwood Avenue is not required.

7. **“Pre-Design Investigation Summary Report and Final Status Survey Evaluation for the St. Louis Airport Site Vicinity Properties 01, 02, 07, 13, 14, 15, and IA-11(Partial),” Revision B, dated July 7, 2014**

The Department and DHSS had no comments on the draft summary report.

8. **“Pre-Design Investigation Work Plan for the St. Louis Airport Site Vicinity Properties 56, 57, 58, 59, 01(C), VP-55 Area East of VP-55, and Pershall Road South Ditch,” Revision B, dated April 24, 2014.**

The Department requested a discussion of the historical depth bgs of Coldwater Creek. We again requested the source of ten year flood plain information appearing in the creek work plans.

9. **“Community Involvement Plan for the St. Louis FUSRAP Sites,” Revision 5B, dated August 28, 2014.**

The Department is currently reviewing this plan.

10. **“Institutional Controls Plan for the North St. Louis County Sites,” Revision B, dated August 18, 2014.**

The Department is currently reviewing this plan.

DOCUMENT REVIEWS (CONTINUED)

- 11. “Remedial Design / Remedial Action Work Description for FUSRAP North St. Louis County Sites,” Revision B, dated September 29, 2014.**

The Department is currently reviewing the draft work plan.

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. USACE personnel are immediately notified of findings, and reports are filed for public record.

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

SPECIFIC SITES	JULY	AUGUST	SEPTEMBER
North County Sites (HISS/Futura, SLAPS, and Vicinity Properties)	2, 24, 25, 29	5, 7, 8, 12, 14	2, 9, 18
SLDS	23, 28,	28	11, 18

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, storm water controls/treatment, and investigating locations of potential concern.

U.S. Army Corps of Engineers Coldwater Creek Bi-Annual Sampling

The Department observed bi-annual Coldwater Creek sampling on October 7. We obtained splits of water and sediment samples from stations C007, C008, and C009. C008 and C009 are new stations within the USACE Coldwater creek monitoring program. These samples are currently being analyzed, and our results will be 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 that the concerns of the citizens of Missouri are addressed. Special requests regarding field oversight, research and presentations are welcome. Contact the Federal Facilities Section at (573) 751-3907 for assistance.

OVERSIGHT COMMITTEE

The St. Louis Oversight Committee meets periodically to get updates on current remediation work, discuss the history of the sites, and to be briefed on USACE future plans and provide community feedback to USACE. The next public meeting date of the committee has not yet been scheduled. The St. Louis Oversight Committee sets their own meeting times and agendas; a current contact for the group is Carl Chappell at (Cfchappell@sbcglobal.net).

REGULATORS COORDINATION MEETINGS

Personnel from the EPA, the USACE, 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 of site status, allow for discussion of cleanup issues, and provide coordination of agency activities as they relate to cleanup of the sites. Meetings were held on July 8, July 23, August 5, August 19, September 2, and September 24 during this quarter.

USACE REMEDIAL ACTIONS

NORTH COUNTY

- Characterization sampling of Pershall Rd. continued during the quarter.
- Characterization sampling of Coldwater Creek between Frost Ave. and St. Denis bridge continued.
- VP 57/58 characterization sampling and remediation continued during the quarter.

ST. LOUIS DOWNTOWN SITE

- Plant 6 (Mallinckrodt) excavation of soils underlying building 101 continued during the quarter.
- Excavation and additional sampling close to the Kiesel Hall Street property neared completion.
- Restoration of DT-2 City Property east of the levee was underway during the quarter.



Restoration of city property at the St. Louis Downtown Site was underway on July 23, 2014.

Tasks and Goals for Next Quarter

NORTH COUNTY

- USACE characterization sampling of Coldwater Creek between Frost Ave. and St. Denis bridge will continue.
- Pershall Road characterization sampling may be completed. Banshee Rd. additional verification sampling may begin.
- USACE may begin remediation North of McDonnell Blvd adjacent to Coldwater Creek.
- USACE will continue to remediate at VP57/VP58 west of Coldwater Creek and North of Pershall Rd.

ST. LOUIS DOWNTOWN SITE

- USACE restoration of DT-2 (City Property) will continue and Area 8 work may continue. This work is currently expected to be completed in mid-2016.
- USACE Plant 6/building 101 area soil excavation will continue. This work is currently expected to be completed mid-2015.
- USACE Kiesel Hall Street surrounding area remediation may be completed.
- Additional sampling locations for a remedial investigation addendum may be identified.

DOCUMENT REVIEWS

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

NORTH COUNTY

- IA-10 Pre-Design Investigation Summary Report
- Banshee Road Post Remedial Action Report
- Byassee Road and Six Parcels Post Remedial Action Report
- Frost Avenue Pre-Design Investigation Work Plan
- McDonnell Blvd. Pre-Design Investigation Summary Report
- Final North County Remedial Design/Remedial Action Work Description
- Final North County Institutional Controls Plan
- Final FUSRAP Community Involvement Plan

ST. LOUIS DOWNTOWN SITE

- Final Group 1 Inaccessible Soils Record of Decision
- Final for Kiesel Hall Street
- Destrehan Street Small Work Area Description
- Kiesel Hall Street Property Post Remedial Action Report
- DT-9 Post Remedial Action Report

SITE OBSERVATIONS AND SAMPLING

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

DEPARTMENT PROJECTS

Staff will continue to work on committees affiliated with long-term stewardship (also known as LTS), Groundwater, and the 5-year review.

LONG-TERM STEWARDSHIP

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 over time. 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 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 for which Remediation Goals are deemed suitable for industrial uses. Completion of the project is expected by 2017, and this will be followed by a two-year transitional period to transfer responsibility from the USACE to the U.S. Department of Energy. The department wants these mechanisms to be identified and in place prior to the transition so their effectiveness can be assessed prior to the transition. Regional U.S. Department of Energy—Legacy Management personnel met with the Missouri Department of Natural Resources on September 18 to discuss these issues, and USACE assisted by giving them a site familiarization tour of the St. Louis FUSRAP

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.

Status of Work Completed This Quarter

* USACE Cooperative Agreement funds were not used for all of the staff listed as participating in this training, conference, or meeting; ** USACE Cooperative Agreement funds were used for a percentage of this training.

TRAINING, CONFERENCE OR MEETING	DATES	DEPARTMENTAL STAFF
Hazardous Waste Program, Federal Facilities Section Meeting	7/8,	Carey, Alexander, Anderson, Drake, Doster, Gilstrap *
Vapor Intrusion Training	7/9, 7/10	Carey, Alexander, Gilstrap, Anderson, Drake, Doster (*, **)
SLDS Status Meetings	7/23,	Carey, or Alexander
DHSS, DEQ Meeting	8/20	Carey, Doster
DHSS, DEQ FUSRAP Briefing	8/26	Carey, Drake, Doster
SLDS Safety Training	8/28	Carey, Alexander
Regulator Conference Calls	7/8, 7/23, 8/5, 8/19, 9/2, 9/24	Carey, Drake, Anderson, Doster
Bid Evaluation Training (Lab Services)	9/10	Carey, Alexander (*, **)
Diversity Training	9/16	Carey, Alexander, Gilstrap (*, **)
MDNR USDOE LM Briefing and FUSRAP Tours	9/18	Carey, Drake, Anderson (partial)