



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

AUG 31 2018

Ms. Christine Jump  
Project Manager  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Boulevard  
Lenexa, Kansas 66219

RE: Department's Position on Proposed Record of Decision (ROD) Amendment, West Lake Landfill Superfund Site, Operable Unit 1

Dear Ms. Jump:

The Missouri Department of Natural Resources appreciates the opportunity to provide its position on the Proposed ROD Amendment for Operable Unit 1 of the West Lake Landfill, located in Bridgeton Missouri. I would like to express my appreciation for recently increasing engagement with the Department and very importantly, the community. I also appreciate the level of effort EPA technical staff took in translating the Responsible Parties' remedial documents into an understandable proposal.

The Department's final position on the Proposed ROD Amendment is as follows:

The Department acknowledges the Environmental Protection Agency's (EPA) determination that the West Lake Landfill is not a typical municipal landfill due to the presence of Principal Threat Waste (PTW), the toxicity of the Radiologically Impacted Material (RIM), and the increasing risks due to radioactive decay. The Department supports remedies that are protective and permanently reduce risk and the uncertainty of the long-term management of material present at this site, such as EPA's proposed Alternative 4.

The Department recognizes the need for long-term care and monitoring of any RIM that may be left in place and will work with EPA as it develops a durable stewardship plan for implementation to ensure remaining radiological risk can be managed adequately in perpetuity.

In order to facilitate the development of a durable long-term stewardship plan, the Department requests the ROD Amendment require the assurance of adequate funding by the responsible parties for extended long-term monitoring and



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management of the Operable Unit 1 remedy. This includes, but is not limited to, repair and replacement of necessary engineering controls such as capping systems, monitoring systems, flood protection systems, and pumping systems. These measures should ensure that state and local jurisdictions ultimately will not bear the cost of long-term stewardship at this site.

We understand that EPA will compose the Responsiveness Summary to comments received on the Proposed ROD Amendment and finalize the Amendment. We look forward to reviewing and providing feedback on the ROD Amendment. If you have any questions or need clarification on any of the comments submitted, please contact Mr. Ryan Seabaugh of my staff at (573) 751-8628 or by email at [Ryan.Seabaugh@dnr.mo.gov](mailto:Ryan.Seabaugh@dnr.mo.gov). Thank you.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY



Carey Bridges, RG  
Deputy Division Director

CB:rsr

c: Andrew Wheeler, Acting Administrator, Environmental Protection Agency  
Jim Gulliford, Administrator, Region 7, Environmental Protection Agency