



October 8, 2020

Christine Jump, Project Manager
Superfund Division
United States Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

RE: Receipt of the third draft OU-1 Design Investigation Work Plan and associated documents, West Lake Landfill Operable Unit 1, Bridgeton Missouri, dated September 2020

Dear Christine Jump:

The Missouri Department of Natural Resources' (Department) Federal Facilities Section received the above referenced documents on Monday, September 14, 2020. EPA has hired third party contractors to review the major elements of the document within the time constraints of the current schedule.

Since the Revised Draft Design Investigation Work Plan (DIWP) does not demonstrate that the uncertainty associated with estimating thorium non-exceedance has been incorporated into the Cumulative Distribution Function, and thus the model, we are unable to use the model to review the proposed boring locations interior to Area 1 and Area 2 (SB and TH prefixes). However, the DIWP does propose interior boring locations that appear to have good spatial distribution of boring locations and depth of samples through the use of more traditional methods including: sampling from randomly selected depth intervals, gridded boring locations, and general comparison of boring locations to a 2,000 m² grid. Samples collected from these proposed locations will likely provide useful information to further understand uncertainties and further develop the model for use as an excavation guide. Because the uncertainties of thorium non-exceedance was not fully explored in this work plan, addition mobilizations are possible, depending on the information gathered under this work plan.

The conceptual site model describing the data needs necessary to determine the OU-1 boundary for UMTRCA cover considerations was found to be selective, inadequate, and/or missing throughout the QAPP. Additionally, the document language for the boundary sampling plan is not as clear as what was described and verbally agreed between EPA and responsible parties during previous meetings. It is my expectation that all borings drilled to help define the extent of the UMTRCA cover will extend through the entire waste mass into native material, and step-outs will be performed as necessary to meet the requirements of the ROD amendment.

If you have any questions or need further clarification, please contact me by phone at (573) 751-8628, or written correspondence at Missouri Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

ENVIRONMENTAL REMEDIATION PROGRAM

Ryan Seabaugh, P.E.
Federal Facilities Section

RS:rl

c: Mr. Tom Mahler, Remedial Project Manager, EPA Region 7 (email)