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January 20, 1993

Department of Energy
WSSRAP
7295 Highway 94 South
St. Charles, MO 63304

Dear Sirs:

The following is my commentary on the proposed final storage for the WSSRAP wastes.

I believe the above ground on site storage with chemical stabilization and solidification, or Alternative 6A, to be a secondary and inferior choice to that of vitrification and disposal at the Clive, Utah site, or Alternative 7B.

Although I am generally pleased with the progress which has occurred at the WSSRAP site to this time, it is my nature to prevent problems, rather than to fix them. I feel the choice of solidification and onsite storage of wastes will present another required cleanup in St. Charles County, sometime in the future, anywhere from 100 to 200 years from now. Granted, that cleanup should be easier than this one, perhaps. If disposal cell failure does occur at the WSSRAP site, it most likely would be a result of the integral loss of the double bottom liner, due to the karst geology, or from the tons of new weight on top of it, or from an earthquake, or from the appearance of a new sinkhole to join the many others in the area.

I am concerned that the proposed solidification process increases the volume of the wastes by 32%. I am pleased that the vitrification process decreases the volume of the wastes by 68% and takes only 4 years to do. Vitrification costs more, but you get more for your money, because the final product is much safer to store.

The porous karst geology at the WSSRAP site presents concerns on the preferred alternative, which could be addressed by vitrification and removal of the wastes to Clive, Utah. The permitting required in Utah for the WSSRAP wastes could be pursued during those four years while the vitrification process at WSSRAP was occurring.

Ideally, the WSSRAP site should be permanently relieved of its million year contaminants and returned to the Earth, without a 42 acres tombstone as a memorial to mistakes of the past.

St. Charles County does not need a million cubic yards of toxic wastes permanently stored next to a high school, 1½ miles from residences, on an area of underlying karst porous geology and nearby sinkholes, by a chemical solidification process which mixes concrete with the contaminants.

St. Charles County should be entitled to the best available technology which I perceive to be vitrification and removal to Clive, Utah. The WSSRAP site was never meant to store radioactive wastes in the first place, neither 50 years ago, today or 100 years from now. Utah was meant to do that. The WSSRAP site

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happened due to the frantic war effort in 1940. It was a hurried mistake in location, which we finally have an opportunity to correct at this time. The WSSRAP site geology, the High School, the River, the Busch Wildlife area, and the nearby homes, as well as the One million people living in the Metro area, are all reasons to recognize and acknowledge when choosing where to permanently store these wastes. To endorse the onsite storage of these wastes, or Alternative 6A, would be to endorse a less than adequate, inferior and least costly method of permanent storage for these wastes.

Why should the wastes be stored in Utah? Because it is a better site, dedicated to exactly such an identified purpose such as the WSSRAP wastes. The Clive, Utah site is 25 miles from the nearest home, and it is drier. Utah is already largely contaminated from nuclear bomb testing in the Fifties. The Clive, Utah site is 28 miles away from the nearest body of water and is a commercial disposal facility, licenced by the state of Utah for naturally occurring radioactive materials. It is 81 miles west of Salt Lake City, Utah.

It took 45 years for the WSSRAP site to develop in St. Charles County. If we can spend half of that time, or 22 years cleaning it up, and permanently remove from the County the contaminants which we never asked for in the first place, then we will have done it right after all.

The choice of vitrification and Utah storage would support President-elect Clinton's expected environmental agenda, which is to create a stronger national environmental infrastructure, by forming new jobs. We can set a precedent here at WSSRAP by doing this at a critical time, at the beginning of his Presidency. The Nation is watching us, and DOE has already set precedents here in St. Charles County by their extraordinarily positive responses to citizens' concerns.

In that respect, I will conclude with a heartfelt thankyou to the Department of Energy and especially to Mr. Steve McCracken, who represents the "fresh thinking" of a branch of government which has inherited far too many cleanup sites such as WSSRAP.

Respectfully,

Mary A. Halliday

Mary A. Halliday
St. Charles Countians Against Hazardous Wastes