(action) - Rod
Steve
File

ST. CHARLES COUNTY COMMISSION

COUNTY ADMINISTRATION BUILDING

118 NO. SECOND STREET ST. CHARLES, MISSOURI 63301

947-2603

JANE C. SCHMIDT
Western District Commissioner

GERALD (JERRY) OHLMS
Presiding Commissioner

NANCY C. BECKER
Eastern District Commissioner

December 8, 1988

Mr. Rod Nelson
Department of Energy
Route 2, Highway 94 S.
St. Charles, MO 63303

Dear Mr. Nelson:

I was not aware of the fact that I needed to schedule in advance in order to present input at the public hearing on Tuesday, December 6th at Lindenwood College.

Please find enclosed a statement which I would like to have included in your records of that meeting.

Thank you very much for your assistance.

Sincerely,

Nancy C. Becker

Nancy C. Becker
Eastern District Commissioner

NCB/jm

Enc.

Public Meeting file

003379
12/13/88

ST. CHARLES COUNTY COMMISSION

COUNTY ADMINISTRATION BUILDING

118 NO. SECOND STREET ST. CHARLES, MISSOURI 63301

947-2603

JANE C. SCHMIDT
Western District Commissioner

GERALD (JERRY) OHLMS
Presiding Commissioner

NANCY C. BECKER
Eastern District Commissioner

December 6, 1988

DEPARTMENT OF ENERGY

ENVIRONMENTAL PROTECTION AGENCY

I am pleased to have the opportunity to participate in this public review of the proposed Work Plan for the environmental studies to be undertaken prior to deciding the best alternative for the cleanup of Weldon Spring. The cleanup task you have undertaken -- as employees and contractors of the Department of Energy, the Environmental Protection Agency and the Missouri Department of Natural Resources -- is massive in volume, and to us, as residents of St. Charles County and Metropolitan St. Louis, it is massive in importance. My goal, as an elected official of St. Charles County, is to make certain that the challenge of cleaning up Weldon Spring is resolved in the manner that is the safest. That may not be the cheapest or -- politically -- the easiest.

I have a few specific comments this evening about the proposed environmental impact study work plan. Some of what I am concerned about is what you are <u>not</u> planning to study.

1. First, I would like to state most emphatically that I do not believe that the Work Plan as proposed adequately addresses the <u>full range of alternatives</u>

for the cleanup of Weldon Spring, as required by the Superfund and National Environmental Policy acts. You seem already to have made the decision to keep the contaminated materials at the Weldon Spring site without examining the alternative of finding a location away from the site -- and away from St. Charles County. You seem to have decided already just to study which location within the Weldon Spring area you will choose -- and which kind of technical fix -- that is, above grade, in a remodeled pit, or whatever. Many people, including myself, believe all of Missouri's radioactive waste should be consolidated at one location -- for example, perhaps in land contiguous to the Callaway nuclear power plant in the center of the state. Part of the 6500 extra acres owned by Union Electric and not used for the power plant could be purchased or condemned by the federal government, for above-grade storage of the St. Charles and St. Louis wastes that were dumped in the 1940s, 50s, and 60s. In addition, since there may be no other location for the radioactive wastes from the Callaway plant itself, they, too, may have to be stored near the Callaway plant. On pages 185 and 186 of the Work Plan, you announce that you will not initiate any off-site characterization studies -- that is, away from Weldon Spring. I believe that decision is premature and unwarranted.

2. Second, as a related concern: If it were to be decided that land within the 227-acre main Weldon Spring tract were to be dedicated as a permanent radioactive waste storage site, what wastes from outside of St. Charles might follow? The statement on page 174 that the DOE does not plan to bring wastes to Weldon Spring from the four major St. Louis City and County radioactive sites, and their vicinity properties, may reflect accurately the intentions today, but that promise may be unrealistic. The DOE's proposal for the St. Louis wastes has been repeatedly rejected by St. Louis officials. The City of St. Louis Board of Aldermen, and the St. Louis County Council and Municipal League have voted unanimously to seek Congressional action directing the DOE to remove the wastes and to find a different site away from St. Louis. They do not want to transfer 82 acres at the Airport to the DOE, as

proposed by the DOE. A few elected officials on the St. Louis side of the Missouri River are already proposing that all the Mallinchrodt wastes should be consolidated at Weldon Spring. If the DOE were to proceed with its St. Charles bunker, the threat that St. Louis's one-million cubic yards would be dumped here, too, becomes all the more likely. Once again, the alternative of consolidating all the Missouri wastes on land adjacent to the Callaway plant seems to be the safest, most responsible alternative. The wastes will have to be excavated from all the sites -- and will have to be moved by truck somewhere for disposal. St. Charles County's population is the fastest growing in Missouri. Furthermore, the Weldon Spring site is only nine miles upwind and upriver from St. Louis County. A site or sites away from Metropolitan St. Louis warrants your serious consideration. I do not believe you have the authority legally to abandon that alternative at this time.

3. Third, I would like to express my concerns about any Interim Remedial Action work being considered for the Quarry. I believe that plastic sheeting or other temporary enclosure structure should be installed before any excavation begins of the Quarry's bulk wastes. I also believe the work should be performed by remotely controlled equipment in order to keep workers from being exposed to the unpredictably high levels of penetrating radiation present within the Quarry -- and to keep them away from a possible accidental explosion of the TNT and DNT wastes in the Quarry. I also think the waste should be containerized for transport and during interim storage. This would reduce the exposure of workers and the public at the time when transport for final disposal is undertaken. Containerization also would reduce the dispersal of radioactive material during interim storage.

4. Last but not least, I would like to request that the students and staff at the Francis Howell High School be provided school space away from the Weldon Spring chemical plant area during the remedial action work. I also request that a baseline health study be initiated.

Again, I appreciate the opportunity to make these comments. Eastern District Comm.
Nancy C. Becker