



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

November 13, 1987

Copy to:  
Bob  
Steve  
Bill  
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Ken  
J. Coyne

Mr. Rodney R. Nelson  
U.S. Department of Energy  
Weldon Spring Site Remedial  
Action Project/Office  
Route 2, Highway 94, South  
St. Charles, Missouri 63303



Dear Mr. Nelson:

Enclosed is a copy of the comments we received from the Missouri Department of Natural Resources for the following four interim response actions:

1. Dismantling of Building 401,
2. Dismantling of Building 409,
3. Removal of PCB Transformers, and
4. Debris Consolidation.

Any questions on these comments should be directed to David Bedan. To date, we have not received any other comments.

Sincerely yours,

*Katie*

B. Katherine Biggs  
Chief, Environmental Review Branch

Enclosure

cc: David Bedan

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Division of Energy  
Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

JOHN ASHCROFT  
Governor

FREDERICK A. BRUNNER  
Director

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY  
P.O. Box 176  
Jefferson City, MO 65102

November 12, 1987

Katie Biggs  
Environmental Review Branch  
U.S. EPA, Region VII  
726 Minnesota Avenue  
Kansas City, KS 66101

Dear Ms. Biggs:

The Missouri Department of Natural Resources has reviewed four interim response actions (Group II) which the U.S. Department of Energy (U.S. DOE) has proposed for the Weldon Spring Site. These actions are:

- 1) Dismantling and Disposal of Building 401
- 2) Dismantling and Disposal of Building 409
- 3) Removal of PCB transformers
- 4) Debris Consolidation

MDNR supports the concept of interim response actions if they improve safety conditions or the environment, facilitate later remedial actions, and do not prejudice the decision on the final remedial action for the radioactive wastes. Based on the information provided by the U.S. DOE the MDNR concurs that these actions should be initiated immediately subject to the following comments and requirements:

- 1) Dismantling and Disposal of Building 401 and 409

These activities are subject to both the Missouri Air Conservation Law and the Missouri Solid Waste Management Law. Missouri has adopted the federal Clean Air Act Standards for asbestos handling and has been delegated responsibility for implementing these standards. The Department of Energy and its contractors should develop and maintain close contact with the Missouri Air Pollution Control Program to insure compliance with these standards.

The Missouri Department of Natural Resources also regulates the disposal of asbestos and other demolition wastes under the Missouri Solid Waste Management Law. Demolition waste is required to be disposed of in a state permitted sanitary or demolition landfill; asbestos waste is required to be disposed of in a permitted sanitary landfill.

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Because of the special concerns relating to the volume of waste and to the possible contamination of the asbestos and the other demolition material with hazardous wastes or radioactive wastes, the Department has determined that these materials should be handled as "special wastes". "Special Wastes" means solid wastes requiring handling other than that normally used for municipal wastes. Since radioactive wastes and hazardous wastes are excluded from disposal in sanitary landfills and demolition landfills in Missouri, the Department of Natural Resources cannot approve the disposal of the asbestos and other demolition wastes until a procedure is in place to assure us that no radioactive or hazardous materials are being disposed of in Missouri solid waste landfills. Also of concern is the large volume of material to be disposed of. Therefore, when the specific landfill has been chosen for disposal of this material, the generator of the waste (DOE) and the operator of the landfill must jointly make application to the Missouri Department of Natural Resources for special waste disposal approval. Please contact the Waste Management Program for further information on the approval process. If the waste is to be disposed of in another state, DOE must document that the action is in compliance with the waste management laws of that state.

Alternative 4 (on-site disposal) is rejected because "it is not consistent with DOE's intention to dispose of all non-radioactive waste off-site". DOE should provide justification for this off-site disposal policy.

#### 2) Removal of PCB transformers

MDNR recommends that if Alternative #5 is used, during the "flushing" process care should be taken to contain any spilled material. Also "flushing" should be continued until PCB levels are less than 2 ppm, if transformer and switch carcasses are going to be disposed into a permitted sanitary landfill.

If the PCB liquids are being transported to a facility within Missouri, a licensed hazardous waste transporter must be used. If the PCBs are being transported to an out-of-state facility MDNR recommends that a licensed transporter be used although it is not a requirement.

In the preamble to 40 CFR 761, unless otherwise tested, all dielectric transformers are assumed to contain 50-500 ppm PCB, therefore, untested transformers (22, 32, & 45) should be "flushed" with other transformers.

External pad, poles, and adjacent areas should be tested to determine if PCB contamination exists.

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3) Debris Consolidation

The storage of solid waste on site may be subject to the requirements of the Missouri Solid Waste Management Law. Please contact the Missouri Waste Management Program for assistance in determining whether these requirements apply.

Please contact me if you have any questions on these comments.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY



David E. Bedan  
Weldon Spring Site Work Group Coordinator

DEB/jtw

cc: Ron Kucera, Deputy Director, DNR  
Carolyn deRosis, Legal Counsel  
William C. Ford, Director, DEQ  
Nick Di Pasquale, Director, WMP  
Nick Nikwila, Director, APCP  
Don Maddox, SLRO  
Bill Dieffenbach, MDCC  
John Crellin, MDOH  
Rod Nelson, WSSRAP, U.S. DOE