

April 18, 2008

Debbie Kring, Community Involvement Coordinator  
US EPA - Region 7  
901 North 5th Street  
Kansas City, KS 66101

Dear Ms Kring:

I urge the EPA to remove the radioactive waste and clean up the West Lake Landfill, located in Bridgeton Missouri. This radioactive waste was illegally dumped at this site in 1973. The material needs to be moved to a safe site, away from the Missouri river basin that is a very high hazard for thousands of Americans living downstream from this location.

The EPA has recognized this problem at other nearby sites, and should take similar action at the Bridgeton site.

Thank You  
James M. Urnes  
James M. Urnes  
3561 Boston's Farm  
Bridgeton Mo 63044

130





"Hines, Sharon D."  
<SDHines@magellanhealth.com>  
04/09/2008 10:21 AM

To: Debbie Kring/R7/USEPA/US@EPA  
cc:  
bcc:  
Subject: West Lake Landfill

I am employed at a facility located immediately across the street from this landfill. The air quality is **terrible** on most days. Many of us enjoy walking or sitting outdoors but the pollution and smell are often so bad we are driven inside. There are days when cars in the parking lots have a coating of residue. Many people in the facility suffer from respiratory problems. We need to have this area cleaned up for our safety.

It is essential that Congress mandate that the Corps take charge of removing the radioactive waste from West Lake Landfill before the Corps' trained and experienced contractors leave St. Louis. That means NOW.

Thank you in advance for your attention to this matter. There is a dire need to take our concerns seriously and prevent further medical distress for all the people working in this area.

*Sharon Daniels-Hines, MSW, LCSW*  
*USPS EAP Care Manager*  
*Magellan Health Services*  
*14100 Magellan Plaza*  
*Maryland Heights, MO 63043-4644*  
*314-387-2343*  
*314-292-1085 (fax)*  
*SDHines@Magellanhealth.com*

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"Higginbotham, Mike W."  
<MWHigginbotham@magellanhealth.com>

04/09/2008 12:48 PM

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject radioactive material dump Right next to Pattonville High School

Please use all possible human and financial resources that you may have to help remove this radioactive material near one of the largest high school in our state. This dump is in back yard of the high school next to our students. Next to thousands of people working nearby. It will cost only penny's to remove this material vs. the uncountable loss of life, when this area next floods, or when this site begins leaking more than it already is. This information on this dumpsite is just now being discovered. IT will clearly become and much larger community state and federal issue shortly. I hope your efforts will be noted as someone helping to have this deadly radioactive material moved away from our school and work sites. Thank you.



"Kleffner, Teresa S."  
<TSKleffner@magellanhealth.com>

04/09/2008 12:52 PM

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject radioactive wastes in West Lake Landfill

Dear Debbie Kring,

I am writing to you about my concern involving the radioactive waste that is in the West Lake Landfill in Maryland Heights, Missouri. I work directly across from the dump and am concerned about my health and safety along with the safety of my coworkers.

I am concerned that dust that covers my car and the roads from the dump may contain some of this waste.

I am also very concerned for the drinking water.

I beg of you, please do everything you can to see that this material is removed in its entirety from this site.

Thank you,

Teresa Kleffner

Teresa Kleffner, LCSW  
Clinical Manager in After Hours  
Magellan Health Services - Midwest CMC

Phone: 314/387-4860

Fax: 314/387-4667

[tskleffner@magellanhealth.com](mailto:tskleffner@magellanhealth.com)

[www.MagellanHealth.com](http://www.MagellanHealth.com)

"Getting Better All The Time."

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"Meyer, Eugene J."  
<EJMeyer@magellanhealth.com>

04/09/2008 02:54 PM

To: Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject: West Lake Landfill Site

Ms. Kring,

I work in the Riverport business complex, south of the I-70 and south of the West Lake Landfill. I have 1,500 fellow employees in this facility. While our water supply is not threatened by the radioactive material in the West Lake Landfill, I am concerned about the potential of radioactive dust and radioactive radon gas and their daughter products drifting over our facility. I strongly believe that this site should be cleaned up and the waste removed or a suitable containment system be established. I think that having the radioactive material in the flood plain is dangerous and with our current technology we should make every effort to clean up this site. I appreciate the work that the EPA has done in Weldon Springs, at the airport, and at the old Malincrodt facility. The radioactive waste from these and other facilities that found its way to the West Lake Landfill should be dealt with properly so that we can minimize any dangers.

Thank you.

**Gene**

*Eugene J. Meyer*



"Carrawell, Joice"  
<JLCarrawell@magellanhealth.com>

04/09/2008 02:55 PM

To: Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject: waste at West Lake

Dear Miss Kring,

My name is Joice L. Carrawell and I am an employee at Magellan Behavioral Health Service. We are located across the street from the West Lake Landfill. I am emailing you to ask you to please have the radioactive waste in the land filled removed. Everyday in the spring and summer we have to smell it and it makes us sick to our stomachs and we are unable to concentrate on our work in addition to that we have to drink the water that is being filter from the Missouri River which is at risk of being contaminated from the waste. I am not asking you to do this so that we are comfortable I am asking you to do this for our health and safety. Please take this in consideration and thank you for your time.

Sincerely,

*Joice L. Carrawell*



Joice L. (Woods) Carrawell  
Organizational Service Specialist I  
email: jlcarrawell@magellanhealth.com  
314-387-5543



"Chapa-Rich, Doreen B."  
<DBChapa-Rich@magellanhealth.com>

04/09/2008 03:26 PM

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject Westlake Landfill Radioactive Hazard-- EPA

Dear Ms. Kring:

In regard to the Westlake Landfill radioactive waste, we must have the Corps take charge of removing the radioactive waste before the Corp's experienced contractors leave St. Louis. It would be unconscionable to do anything but that!

We appreciate your efforts!

Sincerely,

*Doreen Chapa-Rich*  
*Magellan Health Services*  
*Organizations Specialist*  
*Network*  
*Ph: 314-387-5293      FAX 314-292-1265*



lyn patton  
<lynpatton@msn.com>  
04/09/2008 11:18 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject West Lake

I can tell you that the whole West Lake Site is awful to those that have to work and live within close proximity. I work directly across the street from the place, within 150 feet. Most people have burning red eyes that are irritated, the smell is rank and awful. Most people complain of headaches. I heard that some people have skin and some type o brain cancers. There are 1500 people in the place where I work. If you are on the top floor of this place the circulation and ventilation is awful causing the fumes to just hang in there, like you are on a plane with recycled air. Not uncommon for peoples eyes to be running, red, swollen as if they where in a chemical plant. We are in a corporate office so it is awful. I have actually had to miss work due to eyes just being too swollen, or just to ill. I find great releif when I am away from the environment all together. For instance, I went out of town for one week. I felt great, my eyes where clear, my breathing improved, no stuffy nose. Alot of people complain of constant allergies, stuffy noses.  
Most have severe headaches.

I personally have seen a decline in my quality of life; have to use warm compresses on my sore eyes at night that are completely blood shot, respiratory problems, allergies, fatigue, headaches, rashes. It is awful. I don't know what you are digging around in, but I feel that the place is bad.

I been across the street since 2007 and it has been no picnic in the park. This place is heavily populated, in Earth City, MO, with , corporate parks and casino's, grade schools, high schools, subdivisions, there must be over 10, 000 people working directly across the street in that office park.

But I will say in closing, the radio active dumping is not a good thing in a densely populated area. The GASES alone from this landfill are really really awful, the odor is something that is hard to sit and work in for 9 hours a day. . This whole site should not be there, the area has farm lands also in close proximity.  
3

Most IMPORTANT, it is a FLOOD PLAIN. Most of EARTH CITY was under water during the great flood of 1993.

I know you are concerned with the radio active waste. I'm concerned with the air quality overall, It is not safe.

Thank you,

Lyn Patton

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Robert Lowes  
<rlowes@swbell.net>  
04/09/2008 04:32 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc

Subject Remove West Lake Landfill wastes

7425 Teasdale Ave.  
St. Louis, MO 63130  
April 8, 2008

Debbie Kring, Community Involvement Coordinator  
U.S. Environmental Protection Agency, Region 7  
901 North Fifth St.  
Kansas City, KS 66101

Dear Ms. Kring:

In December of 2006, I wrote to you because I had grave concerns about the “hot” waste in a Missouri River floodplain, the West Lake Landfill nuclear waste. I am writing again in 2008, for you have thankfully reopened the public comment period and given me another opportunity to request you change your plan to leave the waste in place, cap it, and depend on “institutional controls” to protect Missourians for billions of years. **The West Lake Landfill wastes must be moved out of the floodplain, away from people, and to a federally licensed radioactive waste disposal facility outside Missouri.** In doing so, you will thus eliminate human exposure during floods and the possibility for intake into Missouri American Water Company’s drinking water system for local residents.

First of all, the EPA’s *Proposed Plan* relies on data, summaries, and conclusions in the May 2006 *Feasibility Study* and the April 2000 *Remedial Investigation Report* prepared for potentially responsible parties with a clear conflict of interest. For example, data included in the *Feasibility Study* prepared by Engineering Management Support, Inc., actually warrants West Lake’s designation as hot waste, yet conclusions are drawn to the contrary. Also, the *Feasibility Study* refers to proprietary controls consisting of deed restrictions, environmental covenants, and other land use restrictions as “preferred” institutional controls; later the EPA’s *Proposed Plan* speaks of the “effectiveness of the institutional control strategy.” Potentially responsible/liable parties would of course prefer legal agreements limiting development of the land to a landfill over major remediation of the site that would interrupt their landfill business. Parties engaged in waste storage have an interest in preserving the storage property so as not to disturb the continuity of the business; parties protecting their business would rather maintain a fence around it than possibly maintain or monitor the NRC on-site recommendation of an engineered disposal cell that would provide protection from erosion, infiltration and bio-intrusion. In short, both the *Feasibility Study* and *Remedial Investigation Report* are biased documents prepared with the business interests of West Lake Quarry and Material Co., Rock Road Industries, Inc., and Laidlaw Waste Systems in mind.

Second, how can the EPA possibly conclude the “institutional control strategy” is effective when it has only been in place for a micro-fraction of the 4.5 billion x 10 years some of the waste will remain a threat? Take, for example, the case of Rock Road Industries, Inc., one of the potentially responsible parties who signed a June 30, 1997, environmental covenant institutional control and a later supplemental declaration in January 1998. Roughly ten years after the first covenant, Rock Road Industries, Inc., no longer exists as such but has been reconstituted as Allied Waste LLC DBA Midwest Waste Systems. It unlikely any of the businesses that have agreed to deed restrictions and environmental covenants will be in existence billions of years from now.

In addition, the *Proposed Plan* promises ongoing renewal of environmental covenants every twenty-five years, a time span that is meaningless in light of the half-life of a radioactive contaminant like Thorium 232—14 billion years. In April of 1984, the Survey Research Center at the University of California, Berkeley, prepared a report for the DOE titled, “Communication Across Three-hundred Generations: Deterring Human Interference with Waste Deposit Sites.” Even the U.S. Nuclear Regulatory Commission Office of Nuclear Material Safety and Safeguards’ June 1988 summary report recognized we must look beyond three-hundred generations when it concluded that West Lake waste would “likely require moving the material to a carefully designed and constructed disposal cell.”

Third, the May 2006 *Feasibility Study* notes, that “institutional controls require ongoing monitoring, maintenance, and enforcement to be effective,” yet the 1997 and 1998 land-use covenants included in Appendix C of the study make no mention of who is going to monitor and maintain, even if the Proposed Plan requires an MDNR easement for enforcement of restrictions. Laidlaw Waste Systems (since reconfigured as Laidlaw Educational Services and Laidlaw Transit), for example, has signed no agreement regarding specific monitoring or maintaining. When 21<sup>st</sup> century corporations that signed covenants go bankrupt, what entities will become fiscally and morally liable for monitoring of wells and data collection? If a 1000-year flood occurs, a levee is breached, and the drinking water intake at the north St. Louis county water plant is radioactively contaminated, who is responsible for the contingency plan? Is there a contingency plan that can foresee all possible disturbances of the West Lake radioactive waste if it is left uncontained? Institutional controls were unable to prevent repeated re-grading and moving of contaminated soil by AAA Trailer as recently as 2003. In short, the EPA seeks to assure us institutional controls will keep radioactively contaminated wastes from the human biosphere for billions of years, yet those controls could not prevent a trailer company from disturbing radioactive soil only thirty years after it was placed at West Lake.

The West Lake Landfill radioactive waste is currently accessible to the air, as well as ground and surface water, and is at risk of further distribution in the event of flood seepage or a levee break. I vividly recall watching seeping water pool behind critical levees during St. Louis’s last 500-year flood. The threat of radioactive waste disturbance for billions of years in the same floodplain is unthinkable to me. I believe the dangerous waste should be excavated, containerized, and transported out of the St. Louis metropolitan area and to a licensed Department of Energy or Department of Defense facility or licensed commercial disposal site. Also, during the removal process, a temporary pressurized building must be placed above the excavation site in order to

capture radioactive dust. The EPA should commit to removing the West Lake Landfill nuclear waste away from millions of people, away from an earthquake-prone area, and away from the Missouri River.

Thank you for your consideration of this matter.

Sincerely,

Saundra A. Lowes



"Henry Robertson"  
<hrobertson@greatriverslaw.org>

04/09/2008 11:09 AM

Please respond to  
"Henry Robertson"  
<hrobertson@greatriverslaw.org>

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject West Lake comments

Dear Ms. Kring:

I attach comments on West Lake landfill. I hope this format is acceptable. Thank you for taking them.

Henry Robertson  
Great Rivers Environmental Law Center  
705 Olive Street, Suite 614  
St. Louis, MO 63101  
(314) 231-4181  
(314) 231-4184 (facsimile)



[www.greatriverslaw.org](http://www.greatriverslaw.org) WL comments 040808.doc

April 8, 2008

Henry Robertson  
1927 Mitchell Pl.  
St. Louis MO 63139

Ms. Debbie Kring, Community Involvement Coordinator  
U.S. EPA, Region VII  
901 N. 5th St.  
Kansas City KS 66101

**Comments on Proposed Plan for West Lake Landfill, Bridgeton, MO**

Dear Ms. Kring:

I write to emphasize the need to remove radioactive waste from the landfill.

The presence of these wastes means that West Lake cannot be treated as just another municipal waste landfill. RCRA does not apply. Radioactive waste is excluded from the definition of solid waste in 42 U.S.C. § 6903(27) and is classed instead with mixed waste that is subject exclusively to the Atomic Energy Act (AEA). 42 U.S.C. § 6903(41).

The absence of a liner from the remediation plan poses an unacceptable risk to drinking water supplies in both St. Louis City and County.

Even with a liner to prevent leaching of radionuclides into groundwater, the risk is still unacceptable due to the location of the landfill in the Missouri River floodplain. The growing number of levees and other flood control structures has been raising flood heights on the Missouri, Mississippi and their tributaries. The Corps of Engineers, which has historically refused to consider the cumulative impacts of its projects, is primarily responsible for this increased risk of flooding. Therefore EPA should not defer to the Corps' judgment that the levee confers adequate protection.

Given the extremely long half-lives of some of the radionuclides in West Lake Landfill, EPA must be concerned with much more than 100-year floods. For example, 40 CFR Part 191, "Environmental and radiation protection standards for management and disposal of spent nuclear fuel, high-level and transuranic wastes," requires, among other things, 10,000-year assurances of non-release to the accessible environment, 40 CFR § 191.13(a); maximum effective doses through all potential pathways from the disposal system for 10,000 years, § 191.15(a); and protection of groundwater for the same period. 40 CFR § 191.24(a)(1). The 1,000-year assumption in the BRA, p. 11, is inadequate. The changes in geology and hydrology, not to mention the floods that may occur, in 10,000 years is beyond human foresight. Yet even 10,000 years is not long enough to dissipate the threat posed by these radionuclides.

I therefore see no alternative protective of the public health but to remove the radioactive wastes from West Lake.

Thank you for considering my comments.

Sincerely,

Henry Robertson

## Earth City Board of Trustees

111 Corporate Office Drive, Suite 103  
Earth City, Missouri 63045  
314-291-8900  
314-298-2509 FAX

April 17, 2008

U.S. Environmental Protection Agency  
Region 7  
901 North 5<sup>th</sup> Street  
Kansas City, KS 66101

Attention: Ms. Debbie Kring

Re: West Lake Landfill Superfund Site  
Bridgeton, Missouri

Dear Ms. Kring:

On June 27, 2006, the Trustees advised your office the Trustees preferred plan of remediation is the removal of the radioactive material from the landfill. The Trustees also expressed a concern about airborne contamination resulting from the actual removal work.

Trustee representatives attended the March 27<sup>th</sup> public meeting held in Bridgeton. Based upon this meeting, and subsequent information obtained by the Trustees, the official position of the Trustees has changed to a position of neutrality.

The Trustees neutral position does not lessen the Trustees concern about the existence of the radioactive material in the landfill. The Trustees are concerned about the adequacy of the EPA's containment plan but Trustees are also concerned about potential additional risks associated with the effort to remove the radioactive material.

West Lake is an old, large and essentially unmapped landfill. Until such time as the Trustees better understand all the risks associated with any remediation plan, the Trustees shall not endorse any remediation plan.



Steve W. Schulte  
Chairman  
Earth City Board of Trustees

slr



Deanna  
<zaneydee@peoplepc.com>

04/09/2008 01:31 PM

Please respond to  
Deanna  
<zaneydee@peoplepc.com>

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject RE: RE: West Lake Landfill Superfund Site

I work and live in the area in which if a levee broke or the radio active products would be in my water or in the air affect me. I already wonder since we work across the street if there is a correlation to all of the allergies people experience. we want our air and drinking water protected.

---

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<wildreturn@charter.net>

04/09/2008 02:47 PM

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject Comments on West Lake - final oops!

Dear Ms. Kring:

I apologize so profusely. Here I am, resending my comments a third time, because, I am embarrassed to admit, I totally overlooked the incorrect spelling of your name! Below is the corrected version I would like to submit, with the correct spelling of your name - a few other corrections. Whew! It's been a day of errors, and not quite a "comedy of errors," unfortunately. Any more errors in my comments will just have to go on record.

Thanks for your patience,  
Christina McClarren

-----  
My Corrected Comments

Debbie Kring  
Community Involvement Coordinator  
EPA Region 7  
901 North 5th St.  
Kansas City, KS 66101

Dear Ms. Debbie Kring,

I am feeling a deep sense of urgency about the way we humans need to respond to the many ecological crises we are all faced with, but I am particularly concerned at the moment about our response to the West Lake Landfill.

I live in a little house with my husband in St. Louis, MO at 4108 Federer (63116) - the south side of the city. I am a 43 year old woman. The water I drink is precious to me as I am sure it is to all who take the time to think about it, rather than take it for granted.

The water that comes into my tap comes from water drawn from the floodplain of the Missouri River, which this West Lake Landfill is contaminating. It horrifies me to know I am drinking this waste. Women are particularly vulnerable to storing pollutants in their fat cells, leading often to higher rates of cancer for us. We need to clean this site up and move the West Lake wastes to a different site. You might justifiably ask me the logical question, "Where should we move it, then? Is there any good place for such wastes?"

No, there is no "good" place for such wastes, but there are better places than others. I believe we can intelligently prioritize and determine sites that we, to our best estimate, think will cause the least harm to our precious webs of life. An intelligent first priority seems to be to keep these wastes away from water, or areas in which it can get into water supplies easily, as this will quickly spread the contamination the fastest.

I will leave it to you and the many intelligent people working on making this decision to set other high priority areas to avoid. Through a process of

elimination, I am sure you will find a site that the wastes can be moved to. It is unfortunate we have to even do such horrid things as to prioritize and decide, in some sense, sites to dump such death-dealing stuff upon. But the waste is here. We must.

You are not alone in deciding this. It is why we have public comment periods. The responsibility for deciding this will need to be done by all affected by it. And all affected by it need to have binding authority over such decisions. Since we do not, we must trust you to listen to us and decide according to our will. I hope this is what you will do.

I cannot help stating the obvious. In order that we may not have to keep making such decisions, I'd like to see humans stop producing such radioactive waste to begin with - or any pollutants which we know cause harm. I would like all humans to adopt as their number one priority the task of changing our ecological footprint from that of gargantuan proportions to that of more, let's say, tiny elfin size proportions. Smaller scale mischief is much easier to reassess and contain.

I know you will give my comments the respect and serious consideration they are due.

Thank you,  
Christina McClarren

P. S. Another very important aside: Keeping the contamination from spreading through the air we breathe is a vital priority when moving the wastes. We must place what is called a "temporary pressurized building" above the excavation site to prevent the dust from spreading.



<wildreturn@charter.net>  
04/09/2008 02:09 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject Corrections to my comments

Dear Ms. King:

I apologize but I am resending my comments due to the fact that I have discovered errors that I feel important for me to correct. Below is the corrected version I would like to submit.

Thanks  
Christina McClarren

-----  
My Corrected Comments

Debbie King  
Community Involvement Coordinator  
EPA Region 7  
901 North 5th St.  
Kansas City, KS 66101

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<wildreturn@charter.net>

04/09/2008 01:40 PM

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject Comments on West Lake Landfill

Debbie King  
Community Involvement Coordinator  
EPA Region 7  
901 North 5th St.  
Kansas City, KS 66101

Dear Ms. Debbie King,

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Christina McClarren

P. S. Another very important aside: Keeping the contamination from spreading through the air we breathe is a vital priority when moving the wastes. We must place what is called a "temporary pressurized building" above the excavation site to prevent the dust from spreading.



FRAN SONTAG  
<redor\_nmr@sbcglobal.net>  
04/07/2008 08:09 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject uranium waste

Ms. Kring

Please do whatever you can to protect the Missouri River floodplain and it's population safe from the uranium waste at West Lake Landfill. Consider the effect of your/our decisions on many, many future generations.

John Thompson  
6671 Kingsbury  
St. Louis, MO 63130

6947 Columbia Ave.  
St. Louis, MO 63130  
April 9, 2008

Dear Ms Kring:

I am submitting a short statement relating to the forthcoming Record of Decision on West Lake Landfill in St. Louis County because I feel strongly that the radioactive wastes buried there should be exhumed and transported to a federally licensed radioactive waste repository.

I have lived in St. Louis County for forty years and was very surprised to learn, shortly after I moved here, about the radioactive wastes left at various sites around the metropolitan area since the early days of processing uranium for nuclear weapons production. I have participated in many public hearings about those sites and am glad to have the opportunity to express my opinion about West Lake.

Capping the wastes with rocks and clay which could shift or crack for permanent storage in a flood plain makes no sense to me. This proposed solution may seem to be the most expedient and least costly, but is the worst decision for the environment and for the health and safety of area residents.

If the wastes were to be exhumed, as I think they should be, a negative-pressure structure could be constructed that would filter out fugitive dusts. The fact that such enclosures have been used successfully in the remediation of radioactive waste sites makes exhumation a very feasible clean-up option. An article in the September/October 2007 issue of Radwaste Solutions (p. 47) entitled "Gimme Shelter" explains how this worked at the Department of Energy's Hanford site in Washington State. Remote control technology could also be used if there is concern about excessive worker exposure to radiation.

I hope the Environmental Protection Agency will make the decision that will best protect St. Louis City and County and other communities downstream - moving these toxic materials out of a metropolitan area and out of a flood plain.

Sincerely,

Arlene Sandler





FRAN SONTAG  
<redor\_nmr@sbcglobal.net>  
04/07/2008 07:59 PM

To: Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject: uranium waste

Ms. Kring -- Please do not allow West Lake uranium waste to be put in the Missouri River floodplain. Please place it in a heavy structure which will keep it away from ground water and people.

Fran Sontag 6671 Kingsbury, St. Louis, MO 63130



GILBERT MARSH  
<grmarsh@sbcglobal.net>  
04/09/2008 09:18 AM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject radio active threat

greetings!

In 1973, thousands of cubic yards of highly radioactive waste were illegally dumped in the 200-acre landfill. Located in the Missouri River floodplain, West Lake sits 8.5 miles upstream from public drinking water intake pipes.

Missouri American Water Company's North County water plant (in Florissant) provides drinking water from the Missouri River for people who live or work north of I-70. Additional intake pipes farther downstream supply water to the City of St. Louis. Removing the radioactive waste from the landfill will prevent contaminated water from the West Lake Landfill from getting access to your kitchen sink.

The radioactive waste was illegally dumped. No liner exists beneath the site to protect the radioactive material from leaching into the groundwater. Through years of exposure to threats of high river water and heavy rains, resulting in highly-saturated soils, radioactive wastes have been already migrating into the groundwater which flows to the Missouri River.

It is essential that Congress mandate that the Corps take charge of removing the radioactive waste from West Lake Landfill before the Corps' trained and experienced contractors leave St. Louis. i am interested that the corp do everything they can to manage a clean up of this site.

please forward this to all appropriate parties so that this clean up can begin as soon possible.

thank you very much.

gil marsh, m.s.w  
7505 leadale dr.  
st louis, mo 63121  
314-920-3553



"Beauparlant, Timothy A."  
<TABeauparlant@magellanhealth.com>

04/09/2008 10:19 AM

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject Radioactive Waste in Earth City

Ms. Debbie King,

Please remove the radioactive wastes that were dumped at the West Lake Landfill (Bridgeton Landfill) in 1973. These long-lived, dangerous materials (including Uranium, Thorium and daughter products such as radioactive lead and radium) should be transported to a federally licensed site away from water.

Sincerely, Tim Beauparlant  
Cell: 636-795-1233

*Tim Beauparlant, MSW, LCSW  
EAP Consultant-- Midwest CMC  
Clinical First Team  
Magellan Health Services  
14100 Magellan Plaza  
Maryland Heights, MO 63043  
Phone: 314-387-4000 x72515  
Fax: 314-387-5604  
[tbeauparlant@magellanhealth.com](mailto:tbeauparlant@magellanhealth.com)*

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April Harris  
<friendsforapril@live.com>  
04/09/2008 10:58 AM

To Debbie Kring/R7/USEPA/US@EPA, Jeff Gloriso  
<jeffglorioso@sbcglobal.net>  
cc  
bcc  
Subject West Lake Landfill

Ms. Kring:

I am writing you as a concerned citizen and civic activist. I am a lifelong St. Louis City resident. The news that radioactive waste was illegally dumped in the West Lake Landfill in 1973 is painstakingly disheartening.

I'm confident that you are much more astute than I as it relates to the ramifications of one of the levees breaking or failing in the area. The risk is much too great to phantom; let alone deal with.

It doesn't matter how much it is going to cost to correct this atrocity; it is something that has to be done.

If this federal government can access the money to fight an illegal, unnecessary war in Iraq; surely, it can access the funds to clean this site.

We cannot wait. We are in a place that Dr. Martin Luther King, Jr termed as "the urgency of now". I appeal to your humanity to do everything in your appointed power to tend to this atrocity, expeditiously.

Humbly Submitted,  
April Harris  
314-504-6587

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Nicolle Bettis  
<nicollebettis@yahoo.com>

04/09/2008 11:17 AM

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject West Lake Landfill

Debbie Kring ,

Please mandate that the Corps take charge of removing the radioactive waste from West Lake Landfill before the Corps' trained and experienced contractors leave St. Louis.

Thank you,  
Nicolle.

---

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Marilyn Gnaedinger  
<gnaedinger@yahoo.com>

04/09/2008 11:53 AM

Please respond to  
gnaedinger@yahoo.com

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject West Lake landfill

I am writing to support the safe removal of radioactive waste from this site. Such waste endangers our ground water, drinking water, and over all environment.

---

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Pamela Todorovich  
<lactat@hotmail.com>  
04/09/2008 02:34 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc <lactat@hotmail.com>  
bcc  
Subject Westlake radioactive site

Dear Ms. Kring;

I did not want to let this deadline pass without expressing my grave concern for the very possible contamination of North Country's drinking water and land. I grew up in Florissant in North County. My brother and his family are still there. I don't understand why this highly radioactive site at West Lake Landfill is being handled differently than the other radioactive sites around St. Louis. This site should certainly command a serious clean up since it is in a floodplain which by definition will flood someday. I lived on the Missouri River during the Flood of 1973 and know the power of the River to move land, fill, trees, cars and houses, no levee is a sure bet.

This site should be excavated and the contaminated soil should be sent to a federally licensed nuclear waste disposal site. Otherwise someday the EPA will have a even larger problem with thousands of residence with contaminated drinking water and land that cannot be inhabited. It is never too late to do a bad job, so let's do it right the first time.

Sincerely,

Pamela Todorovich  
8 Fair Oaks  
St. Louis, Mo. 63124

Going green? [See the top 12 foods to eat organic.](#)



Dorothy Doyle  
<djfdoyle@earthlink.net>  
04/09/2008 04:50 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc

Subject Clean up nuclear waste

Dear Debbie Kring,

I am writing to say that it is important that the EPA pay attention to the reports from the Nuclear Regulatory Commission (1982 and 1988) that warn about nuclear wastes at the West Lake Landfill in Florissant, MO.

That these wastes are still being "stored" so close to our drinking water is shocking. They have been there far too long. Like other radioactive wastes from the 1940s and 50s, these should be cleaned up immediately and completely.

They must be transported away from densely populated areas, and, during preparation for this transportation, citizens should be protected from radioactive dust. A pressurized building must be built to contain the dust.

As citizens we depend on the EPA to protect the environment and to secure our health and safety.

Thank you for your attention.

Dorothy M. Doyle  
6334 Pershing Ave.  
St. Louis, MO 63130





Midwest CRI  
<midwestcri@yahoo.com>

04/09/2008 03:49 PM

Please respond to  
midwestcri@yahoo.com

To: Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject: West Lake Landfill

This note is to encourage EPA to direct the removal of the radiated waste from the West Lake Landfill in the Missouri River flood plain.

I believe it should be safely excavated with a temporary protective building on top, with filters. The waste should be transported to a federally licensed disposal facility.

I will look forward to more news of this in the St. Louis Post Dispatch.

Barbara Jennings, CSJ  
Director, Midwest Coalition for Responsible Investment  
336 East Ripa Ave.  
St. Louis, MO 63125-2800  
Phone/Fax 314-638-5453

---

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"Greg Iffrig"  
<greg.iffrig@gmail.com>

04/09/2008 05:05 PM

Please respond to  
greg.iffrig@gmail.com

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject West Lake Landfill

TO:Debbie Kring  
Community Involvement Coordinator  
Environmental Protection Agency  
Region 7

I am writing as a resident of the City of St. Louis with a family of four and our concerns for the water which we drink and use every day. Our city water is sourced from Missouri River water from a point just downstream from the Chain of Rocks Bridge. While below the confluence these waters are more clearly Missouri River water than Mississippi River water. We also are aware that radioactive waste; which had been dumped illegally at the West Lake Landfill during the 1970's, remains on-site. If not removed it could pose a threat to our future water quality.

As you review the disposition of this radioactive material we ask that the Environmental Protection Agency remove all of it to a federally-licensed facility. The quality of clean water to drink is such basic public service that most of us just expect that. Our cities' future and especially its children will depend on it.

Greg Iffrig  
6244 Loran Avenue  
St. Louis, MO 63109



amy ziegler  
<amosmcgeezer@yahoo.com  
>

04/09/2008 10:02 PM

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject Westlake landfill

To: Debbie Kring, Community Involvement Coordinator  
EPA, Region 7

Dear Ms. Kring,

I am writing to encourage you to use your influence and authority to work for the removal of radioactive waste from the Missouri River floodplain and the West Lake Landfill. The wastes from the Landfill should be moved to a federally licensed radioactive waste disposal facility outside of Missouri.

As a resident of St. Louis and mother of two fourteen year-old children, I fear for their lives, and for the lives of future generations. I want my children to be able to live in St. Louis when they grow up and to be safe from the dangers of radioactive air and water that come with this waste. I believe their lives, as well as the lives of their children will be threatened by the existence of this radioactive waste.

I will follow the actions of the EPA to see how the agency deals with this crucial environmental issue.

Sincerely,  
Amy Ziegler  
314-727-2634

P

---

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"Scheibel, Holly Michelle  
(UMSL-Student)"  
<HollyScheibel@umsl.edu>

04/09/2008 08:15 PM

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject West Lake Landfill

Ms. Kring,

I am not an expert in the disposal of radioactive waste, and will not pretend that I am. But I do know that the proposed solution to the problem at West Lake Landfill will not be solved by the plan proposed by the EPA at the Public Meeting held on March 27. The proposed cover is by no means deep enough to prevent the emission of gamma rays. If it is better to move the waste, please do so.

I urge you and your colleagues to really consider all the aspects of this problem. Namely, that this waste is located in a residential area. Any consequences (positive or negative) will greatly impact a lot of people, whose lives are of unvaluable worth. Thank you for the opportunity to make a comment.

Sincerely,  
Holly Scheibel



Becky Denney  
<dardenne@charter.net>  
04/09/2008 10:00 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject West Lake Landfill

Debbie Kring  
Community Involvement Coordinator  
EPA Region 7

Dear Ms Kring:

The radioactive waste in the West Lake Landfill must be removed so it is no longer in the floodplain of the Missouri River. The high concentrations of uranium, radium, polonium and other radioactive materials exceed the levels found at other toxic sites and exceed the levels permitted in drinking water yet they have been left upstream from where many St. Louisians and other cities get their drinking water. They have also been eroding and blowing in the air we breathe for 35 years.

The NRC reported in 1988 that these wastes should be dug up and put into a lined disposal structure with top, bottom, and sides. If left in the floodplain water will eventually overtop the levee so the waste could be washed out. But it can also seep under the bottom so there is great likelihood that the radioactive waste will get in the groundwater as time goes by.

Thanks for accepting my comments,  
Betty (Becky) Denney  
6410 Arthur Ave  
St. Louis, MO 63139  
314-645-3394



"Paul April"  
<psapril@charter.net>  
04/09/2008 09:37 PM

To: Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject: West Lake Landfill

Debbie Kring

Community Involvement Coordinator

EPA Region 7

Ms. Kring,

I am writing you to urge that the EPA support the clean-up and removal of radioactive waste from the Westlake Landfill. The radioactive waste at Westlake Landfill is Belgian Congo Uranium Residue that is extremely high in radioactivity. The landfill is close to the Earth City area. Earth City is a commercial and residential center that is an important part of the St. Louis area. It should not be faced with the threat of a radioactive waste site on its border. In addition, the West Lake Landfill is near the Missouri River. The landfill is in the Missouri River flood plain. This is, obviously, a various dangerous situation.

I am also concerned that the radioactive waste from Westlake could wind up in the St. Louis drinking water. The Missouri River is a primary source for St. Louis area drinking water. In past decades, other radioactive waste sites in the St. Louis region have been cleaned-up with the help of EPA. I urge you to make the clean-up of the Westlake landfill a top EPA priority.

Paul April



"Margaret Gilleo"  
<mpgilleo@earthlink.net>  
04/09/2008 10:34 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject west lake

Dear Ms. Kring.

I am concerned because nuclear waste at West Lake, MO is in unlined piles and can seep into groundwater. Please clean up this site, as recommended by the Nuclear Regulatory Commission.

Thank you,  
Margaret Gilleo

Debbie Kring  
Community Involvement Coordinator  
U.S. Environmental Protection Agency, Region 7  
901 North Fifth St.  
Kansas City, KS 66101  
[kring.debbie@epa.gov](mailto:kring.debbie@epa.gov)

**Comments Re: The Proposed Plan for the West Lake Landfill Radioactive Wastes.**

Dear Ms. Kring:

Thank you for this opportunity to comment on the EPA's Proposed Plan for the West Lake Landfill.

Implementing the EPA's proposed plan will not protect area residents from the hazards of the radioactive wastes from the Belgian Congo ore processed at the Mallinckrodt Chemical Works' nuclear weapons facility that were illegally dumped in the Westlake Landfill. These radioactive wastes containing uranium, radium, radon, polonium, and radioactive lead, will continue to emit radiation for hundreds of thousands of years. To protect the current and future inhabitants of the St. Louis Metropolitan area, the radioactive wastes must be carefully excavated and removed from the landfill, and from the Missouri River floodplain, and transported to a federally licensed repository, away from rivers and groundwater, and away from human populations. Similar Mallinckrodt wastes at all of the other sites in St. Louis City and County are currently being excavated and transported to a licensed repository out of state.

The EPA's proposed plan denies that the waste is in a floodplain and pretends that flood water will never breach, seep through, or scour holes under the Earth City levee. Levees are notorious for failing by any or all of the causes mentioned above. Dr. Robert Criss, in a conversation with Kay Drey, said that if the levee were breached, radioactive wastes could be at the North County water intake plant in about a day.

The EPA's proposed plan pretends that by placing a cap of dirt or clay and construction rubble over the area, the radionuclides will never come in contact with surface water. How long will the cap be maintained? Until we forget as others in the past forgot? Until a cash strapped agency or government decides it is not a priority? The Feasibility Study states that surface water has already eroded 3,600 cubic yards of material including radionuclides onto adjacent properties in spite of a berm that was supposed to contain runoff. Also that "An additional 17,200 square feet in the northeastern portion of Area 2 contains soil/sediment eroded from the surface of Area 2."

The EPA's proposed plan assumes that groundwater levels are currently well below the radioactive waste in the landfill and will stay at the same level indefinitely. The Feasibility Study admits groundwater is present in the river alluvium soil and also in the bedrock. Water tables can rise and fall depending on the climate change, and geological events. In the event of a severe earthquake the entire floodplain could "liquefy," that is turn into goo. And the radionuclides would be transported though soil and water at whim of nature, contaminating the water we drink, the air we breathe, and the food we eat.

If the EPA does not intend to clean up West Lake landfill by removing the waste and transporting it to a federally licensed repository, then the site should be transferred to the jurisdiction of the Army Corps of Engineers which is currently in the process of removing all of the other Mallinckrodt wastes from the St. Louis sites and transporting them to a federal repository.





Claire Laune  
<clarela@hotmail.com>  
04/10/2008 12:46 PM

To: Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject: Re: West Lake Landfill Cleanup PLEASE!

To: Ms. Debbie Kring, Community Involvement Coordinator EPA Region 7, 901 North 5th Street, Kansas City KS, 66101

Re: Removal of Uranium Wastes at West Lake Landfill to Protect the Floodplain of the Missouri River and all Those Downstream

Dear Ms. Kring,

While I have missed the cutoff for comments, and apologize for my lateness, I would still like to register my CONCERN AND SINCERE REQUEST for the clean up of the West Lake Landfill, removal of the West Lake wastes to a secure site, and, during the excavation, capturing the radioactive dust in a temporary pressurized building to protect the public.

As a tax paying citizen who has lived in this area for over 30 years, I rely on the EPA to protect our waterways and natural resources from materials such as the wastes in the West Lake Site. This site is situated at a critical location in our waterways, and we the public have only you to rely on, The Environmental PROTECTION Agency, paid for by our taxes, to take the necessary action to protect all who live downstream from any potential effects of the West Lake wastes. Anything less than complete removal of this material is not satisfactory, and I believe it would not be in keeping with the mandate of the EPA. Now is the time to address and fix this permanently--this is situated in a floodplain! Action must be taken immediately.

Again, I apologize for being a day late...if this cannot be included in the public comment register, please at least remember there is another person here in the St.Louis County area that is relying on you and the EPA to protect us and take immediate action to insure the well-being of all living downstream from the West Lake Landfill. I can think of no better use for my taxes to go to and sincerely appreciate your most strenuous efforts to make this top priority and see it through to the safe removal and safe containment of this material away from the West Lake Landfill and as far away from people and water as possible. Other sites have been and are in the process of being cleaned up. This one must also be cleaned up.

Thank you for considering the safety of our community in your deliberations and for your ongoing dedication to protecting the citizens and precious natural resources of this community as well as others.

Sincerely,

Clare Laune

16651 Caulks Creek Ridge  
Chesterfield, MO 63005-6546

Get in touch in an instant. [Get Windows Live Messenger now.](#)



"mary ann zaggy"  
<maryzagg@hotmail.com>  
04/09/2008 12:27 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc <maryzagg@hotmail.com>  
bcc  
Subject April 9

April 9, 2008

To: Debbie Kring  
  
Community Involvement Coordinator  
  
EPA Region 7  
  
901 North 5<sup>th</sup> Street  
  
Kansas City, Kansas 66101

From: Mary Ann Zaggy  
  
6303 McPherson Avenue  
  
University City, Missouri 63130

Dear Ms. Kring,

This is written to request that the Environmental Protection Agency NOT permit the keeping of long-lasting radioactive uranium waste at the West Lake landfill site. That these wastes will not be adequately contained and would be adjacent to two major St. Louis drinking water intakes will expose many people to harmful radiation. This site is in the Missouri floodplain, and is upstream from Florissant and the City of St. Louis.

26 years ago, in 1982, the EPA had already concluded that the West Lake site contained extremely high levels of radioactivity, residues of nuclear weapons dumped there in 1973. At that time, the EPA had recommended that if those wastes were to remain in situ, they should at least have been placed in well-sealed structures. Now, the current administrators at the EPA want to leave these wastes on-site, without significant containment.

***Theses wastes must be moved, and the site should be cleaned up, as were similarly contaminated sites in St. Louis city and St. Louis County. Do not let these wastes remain. Remove them to federally-licensed waste disposal facilities as far away from people and water as possible.***

Doing anything less is akin to gambling, and not knowing the outcome until its effects befall our children and grandchildren.

Sincerely,

Mary Ann Zaggy

Citizen and Parent



"Paul Rosasco"  
<paulrosasco@emsidenver.com>

04/09/2008 05:04 PM

To: Debbie Kring/R7/USEPA/US@EPA, Daniel Wall/SUPR/R7/USEPA/US@EPA, Cheryle Micinski/R7/USEPA/US@EPA  
cc: "'Whitby, Kathleen'" <kwhitby@spencerfane.com>, "'Hockley, Mike'" <mhockley@spencerfane.com>, "'Victoria Warren'" <Victoria.Warren@awin.com>, "'Charlotte Neitzel'"  
bcc:

Subject: West Lake Respondent Comments on the Proposed Plan

Ms. Kring,

Attached, please find comments on the proposed plan for the West Lake Landfill Superfund Site. These comments have been prepared by Engineering Management Support, Inc. on behalf of the private party Respondents to the Administrative Order for Operable Unit 1. We request that these comments along with the prior comments we have submitted be entered into the Administrative Record for the Site.



Thank-you. West Lake Respondent Comments on Proposed Plan 4-9-08.pdf

## ENGINEERING MANAGEMENT SUPPORT INC.

8125 West Grand Ave. Suite 100  
Littleton, CO 80123

Telephone (303) 940-3426  
Telecopier (303) 940-3422

April 9, 2008

U.S. Environmental Protection Agency  
Region VII  
901 N. 5<sup>th</sup> Street  
Kansas City, Kansas 66101

**ATTENTION:** Ms. Debbie Kring

**SUBJECT: Comments on Proposed Plan  
West Lake Landfill Operable Unit 1, Bridgeton, Missouri**

Dear Ms. Kring,

On behalf of Cotter Corporation, Bridgeton Landfill, LLC. (f/k/a Laidlaw Waste Systems (Bridgeton), Inc.), and Rock Road Industries, Inc. (the private party Respondents), Engineering Management Support Inc. (EMSI) provides these comments following U.S. EPA's third public meeting, held March 27, 2008, on the Proposed Plan for Operable Unit 1 (OU1) of the West Lake Landfill Site.

As U.S. EPA is aware, the Respondents fully support the June, 2006 Proposed Remedial Plan for the West Lake Landfill Site, and are prepared to begin negotiating a settlement document and design plan for this remedy once U.S. EPA issues a Site Record of Decision (ROD). The Respondents urge U.S. EPA to sign the ROD as soon as possible.

Although the Respondents understand U.S. EPA's mandate to engage in a full and fair public comment process, of approximately 100 people in attendance at the March 27 meeting, only 8 identified themselves as Bridgeton residents. The public comment window for this proposed remedy effectively has been open for 22 months now, and the public, including local residents, have had ample opportunity to make their views known to U.S. EPA.

The Respondents also observe that U.S. EPA's purpose in holding the third public meeting was to provide additional information concerning flood conditions, levees and flooding protection for the Site. The specialists who made presentations on March 27 from U.S. EPA, the U.S. Army Corps of Engineers, and the Earth City Levee Protection District accomplished this task very well. In contrast, many of the individuals who spoke at the March 27 meeting diverged from the topic and simply repeated opinions already presented for the Site's administrative record or offered statements which had little to do with the Site and its cleanup options.

With respect to the potential for flooding to affect the proposed remedy, the Respondents believe that evaluation of potential flooding, if any were to occur, and assessment of such flooding on the toe of the landfill cover can be performed as part of the remedial design activities. These evaluations can be used to determine the need for and design of any reinforcement of the landfill toe and how such reinforcement would be integrated with or possibly replace the rock/debris layer proposed for inclusion in the landfill cover.

The remedy selected by U.S. EPA in the June, 2006 Proposed Plan meets the threshold requirements specified by the National Contingency Plan (NCP) – protection of human health and the environment and compliance with applicable and relevant and appropriate requirements (ARARs). This remedy also best meets the balancing criteria specified by the NCP, which include long-term effectiveness and permanence, reduction in toxicity, mobility and volume, short-term effectiveness, implementability and cost. U.S. EPA can, and should, issue a ROD selecting this remedy for the Site. Such a result will satisfy repeated requests from the Respondents and many local residents that U.S. EPA end the Site's study phase and allow the actual Site remediation work to begin.

If you have any questions or desire additional information related to these comments, please do not hesitate to contact me.

Sincerely,  
**ENGINEERING MANAGEMENT SUPPORT, Inc.**



Paul V. Rosasco, P.E.

Distribution:

Shawn Muenks – Missouri Department of Natural Resources  
Victoria Warren - Allied Waste Industries, Inc.  
Ward Herst - Herst & Associates, Inc.  
Michael Hockley - Spencer Fane Britt & Browne  
Charlotte Neitzel - Holme Roberts & Owen  
William Spurgeon - U. S. Department of Energy  
Christina Richmond - U.S. Department of Justice  
Steve Miller - U. S. Department of Energy

# Missouri Coalition for the Environment

6267 Delmar Blvd. Suite 2E, St. Louis, MO 63130, (314) 727-0600

Ms. Debbie Kring, Community Involvement Coordinator  
U.S. EPA, Region VII  
901 N. 5th St.  
Kansas City, KS 66101  
Via Email: [kring.debbie@epa.gov](mailto:kring.debbie@epa.gov); [wall.daniel@epa.gov](mailto:wall.daniel@epa.gov)

April 9, 2008

RE: Comments on Proposed Plan for West Lake Landfill Superfund Site, Bridgeton, MO

Dear Ms. Kring:

Thank you for this opportunity to again address the EPA's Proposed Plan for the West Lake Landfill.

I submit these comments on behalf of the Missouri Coalition for the Environment, our members, and board. I reiterate our comments dated December 29, 2006 previously submitted on this issue and incorporate them by reference. I provide additional comments herein.

The groundwater risks at the West Lake Landfill are insufficiently characterized at the site to draw the conclusions of risk and safety that the EPA has drawn. As noted previously, the high-level, radioactive and radiotoxic materials dumped at the site in 1973 are not contained in any meaningful way.

The waste is sitting in the alluvial floodplain, atop groundwater (and *in* groundwater) that flows toward private wells, the Missouri River, and public drinking water intakes on the Missouri River as detailed in the December 29, 2006 comment letter and the documents pertaining to this site. Notably, the Feasibility Study Report on the West Lake site submitted to the EPA by Paul Rosasco of Environmental Management Support Inc. dated May 6, 2006 admits this major deficiency in characterizing risks of the site:

**"the RI [Remedial Investigation] was neither designed to, nor considered all of the investigations and evaluations that would be required to support definitive conclusions about the potential for contaminants to leach to groundwater over time. Therefore, leaching of radionuclides and possibly other chemicals such as metals or VOCs, to groundwater is considered to be a potential pathway of concern."**  
(P. 20)

And again:

"The results of the RI investigations indicate that the radiological and non-radiological contaminants present in the OU-1 waste materials may not be fully contained." (P. 21) ... "Therefore, **leaching to groundwater** represents a potential migration pathway to be address [sic] by the remedial actions that may be taken at the Site." (P. 21)



Despite the fact that the Remedial Investigation (RI) did not fully investigate and explore groundwater contamination, the EPA concludes the groundwater is safe. How can this be?

The Proposed Plan draws conclusions with inadequate and insufficient data to support those conclusions. For example, Figure 2-9 in the Feasibility Study shows that at least 11 monitoring wells on the perimeter of the site are noted as "no longer exists" and one is noted as damaged. That shows that the EPA is relying on **1 monitoring well** on the western edge of Area 2 (and none on the north side, though groundwater flows northwest toward the Missouri River) from which to draw broad conclusions that groundwater is safe. Whatever information that might be gleaned from perimeter monitoring cannot be accessed now, old data cannot be verified, and current conditions cannot be monitored for changes over time. Why do these wells that would demonstrate migration of contaminants toward the Missouri River via groundwater off site no longer exist? Why have they not been replaced?

In the public hearing, EPA staff repeatedly claim that no contaminated groundwater plume exists or that no plume is moving off-site. How adequate is the groundwater monitoring network when one entire side of the most contaminated part of the site is unmonitored? What data does the EPA rely on? Is it data from these non-existent wells?

Groundwater is not only present in the river alluvium soil. The Feasibility Study admits that groundwater is also present in the bedrock (p. 9). What evidence does the EPA rely on to conclude that bedrock aquifers are 1) not impacted by radiotoxic materials; and 2) not likely to be impacted by radiotoxic materials?

The risk assessment did not address irrigation scenarios from groundwater either for the dreamed-of vineyard to the east or the crop lands to the west. Nor did it address risks when floodwaters carry radionuclides onto crop fields. The risk assessment took a very short view of very long-lived wastes. Thus, it was inadequate and should not guide decisions about this site.

### **Water Moves Radionuclides**

The EMS Feasibility Study states that a berm "on the northern portions of Area 2 controls runoff to the adjacent properties..." which are the Ford and Crossroads properties including the Buffer Zone (p. 6). However, adjacent properties are contaminated because nothing "controls" the runoff. The "control" is inadequate, as the Feasibility Study admits: "During major storm events, a very small portion of Area 2 can potentially drain down the landfill berm onto the Ford property." (P. 7). In fact, the same study notes that the adjacent properties now have **3,600 cubic yards** of eroded material containing radionuclides from the surface of West Lake Area 2 (p. 12) in just 35 years. What volume can we expect to erode leaving the waste on site for thousands of years?

The Feasibility Study also describes erosion of surface sediments occurring *on site*: "An additional 17,200 square feet in the northeastern portion of Area 2 contains soil/sediment eroded from the surface of Area 2." (p. 12) And the Feasibility Study offers still more evidence of erosion: "Occurrences of radionuclides were found in surficial (6-12 inches or

less) **soil at the toe** and immediately adjacent to the landfill berm as a result of the historic erosion from Area 2." (p. 12)

Radionuclides on the surface at the toe of the landfill poses a concern as well because Missouri DNR Director Doyle Childers admits in a February 21, 2008 letter that floodwaters would be "just touching the toe of the landfill at Area 2" if the Earth City levee was breached by a flood the size of the '93 flood. That suggests that a levee failure, however improbable in the short-term (and however likely in the 10,000-700,000 year time frame), would bring floodwater in contact with radionuclides for future generations.

The Feasibility Study also describes the site as being located "2 miles east of the river". The site is actually ½ mile closer to the river than the Feasibility Study states. If the 2-mile assumption figures into the EPA's risk assessments – particularly those relating to groundwater - they must be adjusted to fit reality. Does this impact EPA's calculations on the number and type of domestic and irrigation wells within a certain range? Residents in St. Charles County who rely on alluvial wells downstream from West Lake are concerned that they may face some risks if contaminated groundwater reaches them.

EPA must revisit its Proposed Plan and investigate options that would remove the radioactive waste from the Missouri River floodplain and contain it away from water and away from people. The hazardous lifespan of these poisons extends hundreds of thousands of years into the future. Whatever the limits of our knowledge, they do not excuse us from our responsibility to act on the knowledge we have today. And we know this:

- The atomic weapons wastes at West Lake will be dangerous for more than 700,000 years.
- The wastes are toxic, cause cancer, and cause genetic damage in animals and humans.
- The wastes are this generation's responsibility.
- Humans rely on floodplains for growing crops and building settlements.
- Humans rely on rivers for drinking water and irrigation.
- Humans use groundwater for drinking water and irrigation.
- These realities have been true for millennia and are unlikely to change, therefore

**the radioactive waste should not remain in the Missouri River floodplain.** Instead, it should be carefully removed, and stored at a licensed waste repository where it is isolated and monitored.

Please keep me posted about activities and decisions regarding this site.

Yours truly,

Kathleen Logan Smith, Executive Director



Karen Meyer  
<kb2bird@sbcglobal.net>  
04/08/2008 10:02 PM

To: Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject: West Lake Landfill

Dear Debbie,

Please see the attached letter stating the position of the St. Louis Audubon Society regarding the nuclear wastes at the West Lake Landfill.

Thank you for your consideration in this matter,

Karen Meyer  
Vice President of Conservation



St. Louis Audubon Society West Lake Landfill letter.doc



# St. Louis Audubon Society



April 8, 2008

Debbie Kring  
Community Involvement Coordinator  
U.S. EPA - Region 7  
901 North 5th Street  
Kansas City, KS 66101  
kring.debbie@epa.gov

Dear Ms. Kring,

We are very concerned about the nuclear wastes that were illegally dumped at the West Lake Landfill in St. Louis County in the 1970's. These must be removed and sent to a safer site. A covering of clay and other material can't secure the containment due to the substrate and other factors at that location.

Since it lies in the floodplain of the Missouri River, West Lake Landfill is definitely not a suitable place for this kind of waste. As a matter of fact, it is a dangerous place. Since floodplains contain porous bottomland soils, this site can allow seepage of the nuclear wastes into our water table and the Missouri River, sources of our area's drinking water. Additionally, the possibility of flooding can't be discounted, especially in light of recent changing weather patterns. We've all seen levies that have failed, and a levy breach in Bridgeton could disperse radioactive materials and by-products downstream, creating unforeseen health hazards for those living in our area.

Leaving these wastes in a floodplain is too great a risk to our health and environment. The St. Louis Audubon Society urges immediate and complete removal of these nuclear wastes from the West Lake Landfill so they can be transported to a safer place.

Sincerely,

Karen B. Meyer  
Vice President of Conservation  
St. Louis Audubon Society  
P.O. Box 220227  
St. Louis, MO 63122  
314-602-7318



David Lobbig  
<dl@mohistory.org>  
04/08/2008 05:28 PM

To Debbie Kring/R7/USEPA/US@EPA, Daniel  
Wall/SUPR/R7/USEPA/US@EPA

cc

bcc

Subject West Lake Landfill Comment

Daniel R. Wall  
Project Manager  
U.S. EPA – Region 7  
901 North 5th Street  
Kansas City, KS 66101

Debbie Kring  
Community Involvement Coordinator  
U.S. EPA – Region 7  
901 North 5th Street  
Kansas City, KS 66101

To the West Lake Landfill EPA Project Manager and Community Involvement Coordinator:

I am deeply alarmed at the apparent lack of comprehension and action on the part of the EPA staff and administration regarding the West Lake Landfill and proposed measures to allow radioactive uranium waste to remain there. After an examination of details and history of the matter, an intelligent observer is left to conclude one of the following regarding the EPA's decision: The EPA does not have the acumen or training to understand the evidence before them; the EPA fails to appreciate its responsibility as a servant to the public welfare; or the EPA will not act due to political pressure. Any of these impediments to action are reprehensible and must be corrected in a timely manner. The EPA is a tool for assisting the citizenry in solving deep, burdensome problems such as West Lake. It has the authority and theoretical ability to do so; if it cannot, this must be addressed.

The EPA staff are surely, essentially, intelligent people who not only can understand the science of radioactive substances and how those elements can cause cancer, mutations, and genetic defects for several thousands of years, but how risky it is to base any plan on the critical, necessary assumption that the EPA will always be here to enforce plans enacted. And, as perhaps the EPA staff can appreciate, it will be something of a miracle if the United States is here, in the responsible, politically stable form of which we think of it today, in two or three hundred years. The EPA knows that a thousand is ten times greater than a hundred, and even a single, thousand year period is much longer than the existence of most civilizations. There are some on the staff who must realize that the mighty Roman Republic, which our political, legal, and social order often seeks to emulate in reputation if not in deed, only lasted about 500 years. What other edifices have humans retained in continual, nurturing concern and maintained with

unbroken, technical ability as we are asked to believe this radioactive waste will be remembered and maintained by the EPA? A responsible citizen of today's United States, of today's St. Louis region, feels something for the generations to follow us, no matter by what name they are called, no matter if they are our particular, direct genetic descendants. Surely the EPA staff has some of the same moral compunction? If answers can be made to these statements in the affirmative, then the difficulties with the EPA cannot be in the first two concerns I mention in my initial paragraph. The final concern must remain.

- ~ Please keep in your minds, for I know I do in mine, that a *sincere promise* of retaining the waste in a manner currently proposed by the EPA is neither: It is sincerity of manner based on either delusion or falsehood, and a promise of vigilance that the EPA does not have the perpetual strength or capacity to maintain.

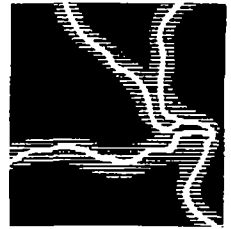
Continuing to consider our abilities to hold this waste in a fragile shell in the path of one of the continent's most powerful rivers, the Missouri, is wasteful squabbling and an obvious diversion. What will be gained from not dealing with this problem now? Will covering the site with rock, clay, and a membrane make it less likely that this radioactive waste will be spread by a flood or human disaster? Our defense would be nothing but hope, for we know that the power of nature will eventually overwhelm all dams and levies. Such an occurrence will not likely be by design, on a schedule and according to a plan; it will be deplored and regretted, and the genie will be out of the bottle. We must act together to prevent this from happening, to preserve the waters and lives of millions living downstream. When we act together, as citizenry and government, to remediate the site and remove this hazard from a floodplain, we do the right thing.

Respectfully submitted,

David Lobbig  
President, Board of Directors  
Missouri Coalition for the Environment  
6267 Delmar Blvd. Ste. 2E  
St. Louis, MO 63130

April 8, 2008

GREAT  
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Mr. Daniel R. Wall  
Project Manager  
U.S. EPA - Region 7  
901 North 5<sup>th</sup> Street  
Kansas City, KS 66101

wall.daniel@epa.gov

705 Olive Street  
Suite 614  
St. Louis, MO 63101-2208  
Telephone (314) 231-4181  
Facsimile (314) 231-4184  
www.greatriverslaw.org

Founding President  
Lewis C. Green, 1924-2003

Re: West Lake Landfill Superfund Site, Bridgeton, Missouri

Dear Mr. Wall:

These comments concern EPA's proposed plan for the West Lake Landfill Superfund Site in Bridgeton, Missouri. In particular, they address EPA's proposal to leave radiologically-contaminated materials in the floodplain.

Approximately two weeks ago, a graph prepared by Washington University's Robert Criss appeared in the St. Louis Post Dispatch. The graph showed that since construction of levees and wing dams began along the Mississippi River, the River has risen above flood stage more frequently, and has risen higher above flood stage than in earlier years.

A key issue for EPA here is whether it should defer to the Corps' and the Levee District's assessment that there is little risk that flood waters will reach the Landfill's contaminated waste. In light of the findings of Professor Criss, both the Corps and the Levee District would be hard-pressed to accurately assess the risk. Further, St. Louis University scientists predict that climate change will lead to 20% more rain, and 50% more water running through the river. On top of that the Corps continues to alter the river, approving and building levees and navigation structures. Even the Corps concedes it has not studied the cumulative effects of these structures on flood heights.

At the very least, the Corps has registered its concern over rising flood trends. In 1995, the U. S. General Accounting Office prepared a report to Congress on the performance, effects, and control of levees and reported:

A continuing Corps study of Missouri River water levels shows that flow rates that once nearly filled the channel have been producing higher flood levels since the late 1920s. Similarly, a 1994 study of flow rates on the Mississippi and Missouri rivers found that flood levels for like flow rates have increased over time. . . . These trends concern the Corps . . .

Mr. Daniel R. Wall  
April 8, 2008

With these concerns in mind, last year, upstream of the West Lake landfill site, a U.S. District Court ordered a stop to a Corps proposed levee, largely because other agencies would not defer to the Corps' judgment. This was after the United States Department of Interior told the Corps:

It has been shown that more and larger levees are increasing the frequency and size of flood events. . . . We are disappointed that the Corps continues to not recognize these basic hydrology facts . . .

In that same case even EPA told the Corps:

Structural flood control measures have clearly altered and continue to impact the physical, chemical and biological integrity of the lower Missouri River. The far reaching effects of levees on the Lower Missouri River are commented on here because the Corps of Engineers has failed to consider the meaning of cumulative impacts.

Upstream, EPA refused to defer to the Corps' judgment. There is no reason to defer to the Corps' judgment here. EPA is gambling-away this Region's health and safety if it defers to the Corps' assessment and the Levee District's assessment that there is little risk the West Lake Landfill site will be impacted by flood waters. The radiologically-contaminated waste should be removed from the floodplain.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Morrison", followed by a horizontal line extending to the right.

Bruce A. Morrison





R Wright  
<wright\_rm@sbcglobal.net>  
04/14/2008 01:04 AM

*Initial comment was sent to  
EPA on April 7th. Ie could  
not open the attachment, so com  
menter resubmitted.*

To Debbie Kring/R7/USEPA/US@EPA, Daniel  
Wall/SUPR/R7/USEPA/US@EPA

cc

bcc

Subject: Comments - Proposed Plan for West Lake Landfill

Rebecca Wright, 2011 Rutger St. St. Louis MO 63104. April 9, 2008

Debbie Kring  
Community Involvement Coordinator  
U.S. Environmental Protection Agency, Region 7  
901 North Fifth St.  
Kansas City, KS 66101  
[kring.debbie@epa.gov](mailto:kring.debbie@epa.gov)

**Comments Re: The Proposed Plan for the West Lake Landfill Radioactive Wastes.**

Dear Ms. Kring:

Thank you for this opportunity to comment on the EPA's Proposed Plan for the West Lake Landfill.

Implementing the EPA's proposed plan will not protect area residents from the hazards of the radioactive wastes from the Belgian Congo ore processed at the Mallinckrodt Chemical Works' nuclear weapons facility that were illegally dumped in the West Lake Landfill. These radioactive wastes containing uranium, radium, radon, polonium, and radioactive lead, will continue to emit radiation for hundreds of thousands of years. To protect current and future inhabitants of the St. Louis Metropolitan area, the radioactive wastes must be carefully excavated and removed from the landfill, and from the Missouri River floodplain, and transported to a federally licensed repository, away from rivers and groundwater, and away from human populations. Similar Mallinckrodt wastes at all of the other sites in St. Louis City and County are currently being excavated and transported to a licensed repository out of state.

The EPA's proposed plan denies that the waste is in a floodplain and pretends that flood water will never breach, seep through, or scour holes under the Earth City levee. Levees are notorious for failing by any or all of the causes mentioned above. Dr. Robert Criss, in a conversation with Kay Drey, said that if the levee were breached, radioactive wastes could be at the North County water intake plant in about a day.

The EPA's proposed plan pretends that by placing a cap of dirt, clay and construction rubble over the area, the radionuclides will never come in contact with surface water. How long will the cap be maintained? Until we forget, as others in the past forgot? Until a cash strapped agency or government decides it is not a priority? The Feasibility Study states that surface water has already eroded 3,600 cubic yards of material including radionuclides onto adjacent properties in spite of a berm that was supposed to contain runoff. Also that "An additional 17,200 square feet in the northeastern portion of Area 2 contains soil/sediment eroded from the surface of Area 2."

The EPA's proposed plan assumes that groundwater levels are currently well below the radioactive waste in the landfill and will stay at the same level indefinitely. The Feasibility Study admits groundwater is present in the river alluvium soil and also in the bedrock. Water tables can rise and fall depending on the climate change, and geological events. In the event of a severe earthquake the entire floodplain could "liquefy," that is turn into goo. And the radionuclides would be transported though soil and water at whim of nature, contaminating the water we drink, the air we breathe, and the food we eat.

If the EPA do not intend to clean up West Lake landfill by removing the waste and transporting it to a federally licensed repository, then the site should be transferred to the jurisdiction of the Army Corps of Engineers which is currently in the process of removing all of the other Mallinckrodt wastes from the St. Louis sites and transporting them to a federal repository.

#

Denise  
Morrison/R7/USEPA/US  
04/08/2008 01:27 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject Fw: (093110750) Region 7 WWW Comments  
Re: Public Information Correspondence  
Westlake Landfill

Denise D. Morrison  
Public Affairs Specialist/Environmental Education  
Coordinator  
901 North 5th Street  
Kansas City, Kansas 66101-2907

Phone: (913) 551-7402  
Fax: (913) 551-7066  
E-mail: morrison.denise@epa.gov

----- Forwarded by Denise Morrison/R7/USEPA/US on 04/08/08 01:26 PM -----



"idaemon.rtpnc.epa.gov"  
<idaemon@unixpub.epa.gov  
>  
04/03/08 10:07 AM

To Group R7Actionline@EPA, Jeffrey  
Wandtke/R7/USEPA/US@EPA  
cc  
Subject (093110750) Region 7 WWW Comments

ADDRESS\_OF\_REQUESTER  
11841 Longmont Dr  
CITYSTATEZIP\_OF\_REQUESTER  
Maryland Heights, MO 63043  
COMMENTS\_OF\_REQUESTER

It was recently brought to my attention that there is a detrimental problem essentially in my own backyard. I live in Maryland Heights and plan to stay here for a long time. The copied email below was sent to me last week and it is very concerning. I certainly hope that every effort will be made to eliminate the contamination currently existing in our landfill. Why on earth would we brush it under the rug and hope it will not affect us in the near future? This sounds like a very serious condition that will not get better on it's own. Isn't poison a serious issue anymore? What do we need to do to make sure someone hears our plea for help to protect our environment, ourselves and future generations of our children? We should not be exposed to these unnatural contaminants. We do not need more health problems in our society. According to the email all of the other sites are being cleaned up. Doesn't Maryland Heights have an advantage, even, with all of the extra area proceeds gained from the nearby casinos? What can I do to help this effort? I now realize the landfill is officially in Bridgeton but that is only about half a mile from my home so the point is still relevant.

Thanks  
Julie M. Byrne  
Maryland Heights resident

---

Subject: Radioactive Waste in the Missouri River Floodplain

EPA Reopens West Lake Landfill Public Comment Period

PLEASE ATTEND THURSDAY, MARCH 27th, 6:30 pm to 8:30 pm

EPA Public Meeting  
West Lake Landfill Superfund Site  
Bridgeton Community Center  
Multipurpose Room  
4201 Fee Fee Road

This THURSDAY, MARCH 27th, the US Environmental Protection Agency will hold a public meeting to discuss its plan to leave highly radioactive waste in the Missouri River floodplain, next to Earth City.

YOU ARE URGED TO ATTEND in order to demonstrate citizen resolve to remove all radioactive waste from the West Lake Landfill. Your very presence, whether or not you speak, will emphasize the community's determination to be heard.

The EPA has taken the unusual step to re-open the Public Comment period for its West Lake Landfill Superfund Site "Proposed Plan." Comments will be accepted from March 27th through April 9th.

This Public Comment period is our last opportunity to affect a change in EPA's Proposed Plan to leave the waste at West Lake.

In 1973, thousands of cubic yards of highly radioactive waste were illegally dumped in the 200-acre landfill. Located in the Missouri River floodplain, West Lake sits 8.5 miles upstream from public drinking water intake pipes. Missouri American Water Company's North County water plant (in Florissant) provides drinking water from the Missouri River for people who live or work north of I-70. Additional intake pipes farther downstream supply water to the City of St. Louis. Removing the radioactive waste from the landfill will prevent contaminated water from the West Lake Landfill from getting access to your kitchen sink.

The radioactive waste was illegally dumped. No liner exists beneath the site to protect the radioactive material from leaching into the groundwater.

Through years of exposure to threats of high river water and heavy rains, resulting in highly-saturated soils, radioactive wastes have been already migrating into the groundwater which flows to the Missouri River.

In 2006, the EPA released its proposed plan to place a cap made of rocks, clay and construction rubble on top of the radioactive waste. The plan was met with public outrage; more than 100 comments were submitted to the EPA. Many comments voiced alarm concerning the potential of flooding.

During the meeting on March 27th, people will have an opportunity to make their voices heard once again. The EPA is expected to tell the public that the Earth City levee will protect the landfill from flooding.

Professor Robert E. Criss, a geochemist at Washington University, commented that, "Levees fail. Several levees in St. Louis County have failed in the last fifteen years. These risks are chronically underestimated." He explained that the flow rate of the Missouri River near West Lake Landfill is about 70,000 cubic feet per second. When asked how long it might take for the landfill's radioactive contaminants to reach the North County water plant, in the event of a levee failure, Dr. Criss estimated, "About a day. The wastes would be everywhere."

The predominant isotope of concern is thorium-230. It has a half-life of 75,000 years. Other isotopes include uranium-238, with a half-life of four-and-a-half billion years. Polonium-210 is also present at West Lake. Though safe cleanup may be costly, it can be done. Modern methods for removing dangerous wastes include "dust suppression tents" that employ negative pressure and filters. Placed above a hazardous site during excavation and cleanup, they prevent the release of radioactive waste particles into the air. (Nothing has been containing West Lake's airborne radioactive particles for the past three decades.) The cleanup of all the other sites in St. Louis that contain similar wastes (from nuclear weapons

production in the 1940's and '50's) has either been completed or the sites are currently being excavated by the US Army Corps of Engineers. The wastes are being transported to federally licensed radioactive waste disposal facilities --- away from water and away from people. It is essential that Congress mandate that the Corps take charge of removing the radioactive waste from West Lake Landfill before the Corps' trained and experienced contractors leave St. Louis. That means NOW. PLEASE ATTEND THE MEETING ON MARCH 27th and please also send written comments to the EPA. Please urge your neighbors and elected officials to attend also, and to send in comments.

EMAIL\_OF\_REQUESTER  
jbnightowl@sbcglobal.net  
NAME\_OF\_REQUESTER  
julie Byrne  
ORG\_OF\_REQUESTER  
none  
TELEPHONE\_OF\_REQUESTER

submit  
Send Comment

-----  
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TSSMS: rgytgrnj  
Mail to File: r7actionline  
-----



morris & virginia mcnabb  
<mvmcnabb@hotmail.com>  
03/24/2008 08:24 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject Radioactive waste

Ms Kring -

In regard to the radioactive wastes at the West Lake Landfill, a few miles upstream from the St. Louis area... There is only one moral choice. Remove the wastes, to bury in a dry area... Water moves. This is the way it is. Water carries materials with it. Putting the waste upstream from a highly populated area was an extremely foolish and unthinking act. The wastes will fan out with time. This is a sure thing. The only unknown is how long it will take. Regardless of how difficult, there is only one choice to make. Move the waste. Not to do that, knowing what we know now, would allow a terrible situation to develop. And once the wastes spread, there is no way in Hell they could ever be brought together and contained.

Thank You,

Morris McNabb  
Rt 1 Box 83  
Queen City, MO 63561

Watch "Cause Effect," a show about real people making a real difference. [Learn more.](#)



"Sherry Newton"  
<msmcnewton@charter.net>  
03/28/2008 11:35 AM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject West Lake Landfill

Please don't allow them to poison West Lake Landfill etal our water further. This needs to be cleaned up now so future generations don't pay the price in disease and death.  
Sherry Newton  
1807 Packard Ct  
Dardenne Prairie, MO 63368



lisa hulett  
<lahglassflame@yahoo.com  
>

03/27/2008 01:14 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject waste

Please do not even consider leaving a mess of waste at  
Earth City.  
Thank you, Lisa Hulett, 3860 Gary Road, Arnold Mo.  
63010-3507, lahglassflame@yahoo.com

---

Never miss a thing. Make Yahoo your home page.  
<http://www.yahoo.com/r/hs>





"Rose A. Jenkins"  
<plasma@mail.brick.net>  
03/25/2008 10:33 AM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject West Lake Landfill Superfund Site

TO: Debbie Kring  
Community Involvement Coordinator  
U.S. EPA - Region 7  
901 North 5th Street  
Kansas City, KS 66101  
kring.debbie@epa.gov  
Toll-free: 800-223-0425

RE: EPA Public Meeting for March 27  
PUBLIC COMMENT re RADIOACTIVE WASTE at the West Lake Landfill

====

SUMMARY:  
REMOVE RADIOACTIVE WASTE FROM THE MISSOURI FLOODPLAIN!!!!!!!

=====

This is a time of extreme unpredictability with respect to what Mother Nature will or won't do. Flooding in the Missouri floodplain has happened, and now that weather extremes are more common, is even MORE LIKELY.

Radioactive material stored there would be DISTRIBUTED OVER A VERY WIDE AREA should another "500 year flood" occur or even a "100 year flood," each of which is occurring much more frequently due to GLOBAL CLIMATE CHANGE.

REMOVE THE HAZARDOUS MATERIAL. Period.

Thank you for this opportunity to voice my opposition to leaving this illegally dumped radioactive health hazard where it is -- IN HARM'S WAY.

Rose Jenkins  
UC, Mo.



"Mary Huxhold"  
<mhuxhold@sagestl.com>  
Sent by: huxhome@gmail.com

03/25/2008 10:59 AM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject West Lake Landfill Waste Comment

Debbie,

Thank you and the EPA for allowing the public this time to comment on the EPA's decisions involving the radioactive waste at the West Lake Landfill site here in St. Louis. I would ask that the EPA reconsider and look at the potential severe health risks involved with leaving the radioactive waste in place. Yes, the levees may hold, but they may also break. As environmental issues become more and more common, we can no longer wait for disasters; we must act to prevent problems from occurring in the first place as we've all learned from Hurricane Katrina. I ask the EPA not to risk the water supply in the St. Louis area by failing to do what is right and clean up this site that has been neglected for several decades.

Thank you for your time,  
Mary

--

Mary Huxhold  
Director of Sustainability  
Sage Homebuilders  
314.852.3818 c.  
314.576.5550 o.  
[mhuxhold@sagestl.com](mailto:mhuxhold@sagestl.com)  
[www.sagestl.com](http://www.sagestl.com)



"Patricia Murphy, CSJ"  
<spatm@charter.net>  
03/25/2008 08:47 PM

To Debbie Kring/R7/USEPA/US@EPA,  
klogansmith@moenviron.org  
cc  
bcc

Subject West Lake Landfill: to Debbie Kring & Kathleen Logan Smith

This message is in regard to the West Lake Landfill Superfund Site.

It is unfathomable to me why persons (who are supposed to be interested in their own health, that of their families and neighbors, and of the entire environment) would not see the necessity of cleaning up a toxic waste area anywhere! When that toxic area will (not only could) leach into the drinking water of the citizens, it is unconscionable to keep such cleanup from occurring!

Please record my voice as saying the cleanup MUST be done! (Maybe we should collect the waste material and put it in the area where the children and grandchildren of the "objectors" play... Although that wouldn't be fair to those children...) None of us wants this sort of thing in our own backyard, but we should fight when it is is ANYONE's backyard.

Please clean it up!

Sincerely,  
Patricia Murphy, CSJ



Melanie Cheney  
<catalpaflappa@hotmail.com  
>

03/26/2008 04:43 PM

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject Radio-active waste in the Missouri Floodplain

**My personal comments are at the bottom, thank you.**

In 1973, thousands of cubic yards of highly radioactive waste were illegally dumped in the 200-acre landfill. Located in the Missouri River floodplain, West Lake sits 8.5 miles upstream from public drinking water intake pipes.

Missouri American Water Company's North County water plant (in Florissant) provides drinking water from the Missouri River for people who live or work north of I-70. Additional intake pipes farther downstream supply water to the City of St. Louis. Removing the radioactive waste from the landfill will prevent contaminated water from the West Lake Landfill from getting access to your kitchen sink.

The radioactive waste was illegally dumped. No liner exists beneath the site to protect the radioactive material from leaching into the groundwater. Through years of exposure to threats of high river water and heavy rains, resulting in highly-saturated soils, radioactive wastes have been already migrating into the groundwater which flows to the Missouri River.

In 2006, the EPA released its proposed plan to place a cap made of rocks, clay and construction rubble on top of the radioactive waste. The plan was met with public outrage; more than 100 comments were submitted to the EPA. Many comments voiced alarm concerning the potential of flooding.

During the meeting on March 27th, people will have an opportunity to make their voices heard once again. The EPA is expected to tell the public that the Earth City levee will protect the landfill from flooding.

Professor Robert E. Criss, a geochemist at Washington University, commented that, "Levees fail. Several levees in St. Louis County have failed in the last fifteen years. These risks are chronically underestimated." He explained that the flow rate of the Missouri River near West Lake Landfill is about 70,000 cubic feet per second. When asked how long it might take for the landfill's radioactive contaminants to reach the North County water plant, in the event of a levee failure, Dr. Criss estimated, "About a day. The wastes would be everywhere."

The predominant isotope of concern is thorium-230. It has a half-life of 75,000 years. Other isotopes include uranium-238, with a half-life of four-and-a-half billion years. Polonium-210 is also present at West Lake.

Though safe cleanup may be costly, it can be done. Modern methods for removing dangerous wastes include "dust suppression tents" that employ negative pressure and filters. Placed above a hazardous site during excavation and cleanup, they prevent the release of radioactive waste particles into the air. (Nothing has been containing West Lake's airborne radioactive particles for the past three decades.) The cleanup of all the other sites in St. Louis that contain similar wastes (from nuclear weapons production in the 1940's and '50's) has either been completed or the sites are currently being excavated by the US Army Corps of Engineers. The wastes are being transported to federally licensed radioactive waste disposal facilities --- away from water and away from people.

It is essential that Congress mandate that the Corps take charge of removing the radioactive waste from West Lake Landfill before the Corps' trained and experienced contractors leave St. Louis. That means NOW.

**I totally agree with the statements above sent to me by the Coalition for the Environment. In an ever changing environment, where disasters happen all the time, like the record breaking flooding that we just experienced, I believe toxic waste sites like this one should not be ignored. I'd rather not take the chance of a catastrophe like this in a nation where Americans can't even get decent health care should they become sick from radio-active waste seeping or flushed into their drinking water, costing the people themselves hundreds of thousands of dollars. Who are the immoral bastards that illegally dump and can they be held accountable? if not, I would hope that our government could at least try to protect their constituents a little better.**

Melanie Cheney

**"Boundaries don't protect the rivers, people do." ~Aristotle**

In a rush? [Get real-time answers with Windows Live Messenger.](#)



"Byrne, Julie"  
<jbyrne@aaortho.org>  
03/29/2008 07:48 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc <klogansmith@moenviron.org>,  
<mjones@marylandheights.com>,  
<woldroyd@marylandheights.com>,  
bcc

Subject Maryland Heights West Lake Landfill Clean-up or Cover-up

To whom it may concern,  
Debbie Kring,  
Kathleen Logan Smith,  
Maryland Heights,

It was recently brought to my attention that there is a detrimental problem essentially in my own backyard. I live in Maryland Heights and plan to stay here for a long time. The copied email below was sent to me last week and it is very concerning. I certainly hope that every effort will be made to eliminate the contamination currently existing in our landfill. Why on earth would we brush it under the rug and hope it will not affect us in the near future? This sounds like a very serious condition that will not get better on it's own. Isn't poison a serious issue anymore? What do we need to do to make sure someone hears our plea for help to protect our environment, ourselves and future generations of our children? We should not be exposed to these unnatural contaminants. We do not need more health problems in our society. According to the email all of the other sites are being cleaned up. Doesn't Maryland Heights have an advantage, even, with all of the extra area proceeds gained from the nearby casinos? What can I do to help this effort?

Thanks  
Julie M. Byrne  
Maryland Heights resident

---

Subject: Radioactive Waste in the Missouri River Floodplain

EPA Reopens West Lake Landfill Public Comment Period

PLEASE ATTEND THURSDAY, MARCH 27th, 6:30 pm to 8:30 pm  
EPA Public Meeting  
West Lake Landfill Superfund Site  
Bridgeton Community Center  
Multipurpose Room  
4201 Fee Fee Road

This THURSDAY, MARCH 27th, the US Environmental Protection Agency will hold a public meeting to discuss its plan to leave highly radioactive waste in the Missouri River floodplain, next to Earth City. YOU ARE URGED TO ATTEND in order to demonstrate citizen resolve to remove all radioactive waste from the West Lake Landfill. Your very presence, whether or not you speak, will emphasize the community's determination to be heard.

The EPA has taken the unusual step to re-open the Public Comment period for its West Lake Landfill Superfund Site "Proposed Plan." Comments will be accepted from March 27th through April 9th.

This Public Comment period is our last opportunity to affect a change in EPA's Proposed Plan to leave the waste at West Lake.

In 1973, thousands of cubic yards of highly radioactive waste were illegally dumped in the 200-acre landfill. Located in the Missouri River floodplain, West Lake sits 8.5 miles upstream from public drinking water intake pipes. Missouri American Water Company's North County water plant (in Florissant)

provides drinking water from the Missouri River for people who live or work north of I-70. Additional intake pipes farther downstream supply water to the City of St. Louis. Removing the radioactive waste from the landfill will prevent contaminated water from the West Lake Landfill from getting access to your kitchen sink.

The radioactive waste was illegally dumped. No liner exists beneath the site to protect the radioactive material from leaching into the groundwater.

Through years of exposure to threats of high river water and heavy rains, resulting in highly-saturated soils, radioactive wastes have been already migrating into the groundwater which flows to the Missouri River.

In 2006, the EPA released its proposed plan to place a cap made of rocks, clay and construction rubble on top of the radioactive waste. The plan was met with public outrage; more than 100 comments were submitted to the EPA. Many comments voiced alarm concerning the potential of flooding.

During the meeting on March 27th, people will have an opportunity to make their voices heard once again. The EPA is expected to tell the public that the Earth City levee will protect the landfill from flooding.

Professor Robert E. Criss, a geochemist at Washington University, commented that, "Levees fail. Several levees in St. Louis County have failed in the last fifteen years. These risks are chronically underestimated." He explained that the flow rate of the Missouri River near West Lake Landfill is about 70,000 cubic feet per second. When asked how long it might take for the landfill's radioactive contaminants to reach the North County water plant, in the event of a levee failure, Dr. Criss estimated, "About a day. The wastes would be everywhere."

The predominant isotope of concern is thorium-230. It has a half-life of 75,000 years. Other isotopes include uranium-238, with a half-life of four-and-a-half billion years. Polonium-210 is also present at West Lake. Though safe cleanup may be costly, it can be done. Modern methods for removing dangerous wastes include "dust suppression tents" that employ negative pressure and filters. Placed above a hazardous site during excavation and cleanup, they prevent the release of radioactive waste particles into the air. (Nothing has been containing West Lake's airborne radioactive particles for the past three decades.) The cleanup of all the other sites in St. Louis that contain similar wastes (from nuclear weapons production in the 1940's and '50's) has either been completed or the sites are currently being excavated by the US Army Corps of Engineers. The wastes are being transported to federally licensed radioactive waste disposal facilities --- away from water and away from people.

It is essential that Congress mandate that the Corps take charge of removing the radioactive waste from West Lake Landfill before the Corps' trained and experienced contractors leave St. Louis. That means NOW.

PLEASE ATTEND THE MEETING ON MARCH 27th and please also send written comments to the EPA. Please urge your neighbors and elected officials to attend also, and to send in comments.

Comments may be submitted in writing or electronically through April 9th, or during the March 27th public meeting. Send written or electronic comments to:

Debbie Kring  
Community Involvement Coordinator  
U.S. EPA - Region 7  
901 North 5th Street  
Kansas City, KS 66101  
kring.debbie@epa.gov  
Toll-free: 800-223-0425

For further information contact: visit our website at [www.moenviron.org](http://www.moenviron.org) or call Missouri Coalition for the Environment, 314-727-0600.

Kathleen Logan Smith  
Missouri Coalition for the Environment

---

email: [klogansmith@moenviron.org](mailto:klogansmith@moenviron.org)  
phone: 314-727-0600  
web: <http://www.moenviron.org>  
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Missouri Coalition for the Environment | 6267 Delmar Blvd., Ste. 2E | St.  
Louis | MO | 63130





Lynne Breakstone  
<breaksl@artsci.wustl.edu>

03/27/2008 06:30 PM

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject West Lake Landfill

I am writing to strongly urge that radioactive waste from West Lake Landfill be removed before the Corps' trained and experienced contractors leave St. Louis.

Levees do fail, and these toxic and dangerous wastes will be washed into the rivers eventually. It is essential that Congress mandate that the Corps take charge of removing this waste immediately.

Sincerely,

(Dr.) Lynne Breakstone  
University City

Rec'd. via reg.  
mail on 3/31/08

EPA Public Meeting  
Bridgeton, MO  
March 27, 2008

Gentlemen,

The EPA proposal of leaving the radioactive contaminated material in the West Lake Landfill seems to me to be an irresponsible and dangerous gamble, especially since this landfill lies in the Missouri River floodplain.

On a more personal note, I love Bridgeton, and I do not like the prospect of our great city becoming known as the city with the landfill containing some of the most dangerous uranium residues on the planet.

I strongly urge you to have all the dangerous material removed from our city!



Alf J. Stole, PE  
Former Mayor City of Bridgeton, MO

11717 BEAVERTON DR  
BRIDGETON MO 63044



RKGRKG@aol.com  
03/31/2008 08:05 AM

To Debbie Kring/R7/USEPA/US@EPA  
cc moenviron@moenviron.org  
bcc  
Subject EPA doing it's job

Good morning,Debbie

EPA must remove the radioactive waste at West Lake landfill. It's the job of EPA to not allow improper disposal of dangerous wastes OR to take care of what was "missed". The location of this lethal waste jeopardizes the water supply of millions. It must be properly removed.

Sincerely,  
Karen Goellner  
taxpayer and supporter of doing the Right Thing

Create a Home Theater Like the Pros. [Watch the video on AOL Home.](#)



Carl Darigo  
<carl.darigo@sbcglobal.net>

04/06/2008 12:24 PM

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject West Lake Landfill

Dear Ms. Kring:

we are very disturbed that EPA desires to leave and cap the radioactive wastes at the St. Louis County, Missouri, West Lake Landfill. This site is in the Missouri River floodplain and will undoubtedly flood some time within the untold centuries the waste remains active. Even worse, the site is upstream of water intakes for the St. Louis metropolitan area. This waste should be moved to a radioactive waste disposal facility.

Carl & Dolly Darigo  
553 Mapleview Dr  
University City MO 63130



patricia kohn  
<kohn6100@yahoo.com>  
04/05/2008 10:48 AM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject West Lake Wastes

In St. Louis we face uncertainty in our weather, with our annual flooding and vulnerable floodplain, but are absolutely certain that we do not want nuclear waste in our drinking water. Please excavate and move the West Lake site wastes as safely as possible, as soon as possible, including placing a temporary building to capture radioactive dust during the excavation. The EPA is cleaning up other sites in St. Louis and please, please, add this one to the list.

You rock. That's why Blockbuster's offering you one month of Blockbuster Total Access, No Cost.



"DeYong, Neil"  
<neil.deyong@shawgrp.com>

04/01/2008 08:42 AM

To Debbie Kring/R7/USEPA/US@EPA

cc

bcc

Subject Transcript of Westlake Landfill Meeting Minutes

Please let me know when and where a transcript of last week's public meeting on the Westlake Landfill will be available.

Thank you very much for your time!

**A. Neil DeYong**

Project Manager  
Shaw Environmental and Infrastructure Group  
110 James S. McDonnell Blvd  
Hazelwood, MO 63042  
Cell: 314.220.4272  
Direct: 314.895.2267  
Fax: 314.895.2203

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<http://www.shawgrp.com>



<lbochantin@netscape.com>  
04/04/2008 03:44 PM

To: Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject

Ms Kring

The EPA's plan to leave highly radioactive waste in the Missouri River floodplain, next to Earth City is a profound mistake. The waste was illegally dumped in the landfill and now sits 8.5 miles upstream from public drinking water intake pipes. This is a flood plain and the levees are known to fail. Geochemists say the risks are chronically underestimated. If this would happen, it would be a terrible disaster. This is a risk that we cannot afford to take.

Please reconsider your plans. Please let me hear from you on this matter.

Leona Bochantin

Netscape. Just the Net You Need.



Marty Walsh  
<mpwengr@sbcglobal.net>  
04/06/2008 02:08 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc Martin Walsh <mpwengr@sbcglobal.net>  
bcc  
Subject contaminated WestLake quarry/landfill

Dear EPA-

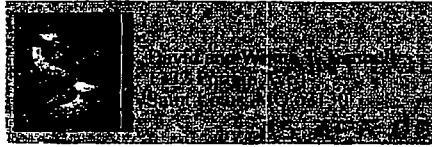
PLEASE support a total proper cleanup of radioactive materials "dumped" in the Westlake quarry/landfill ! My wife & I lived in the near-to-the quarry, Carrollton subdivision from 1959-1971 -about 1/2 mile away & in the path of prevailing winds!

I was then a commissioned/experienced US Corps of Engineers Army officer ,HQ&HQ Co commander, 102d Infantry Division (OZARK DIVN) We had a CBR platoon & trained often locally-my geiger counter often ticked evidence of ground radiation practicing in the subdivision- Once I took a sample of airborne contamination to an evening meeting of the City of Bridgeton City Council & presented it in a lead vessel to then Mayor Swan- It was a piece of airborne dump burning cardboard that landed on our rear yard wash line after Westlake's night time surreptitious unlawful burning!-they illegally burned often to reduce the landfill volume to accommodate more trash/waste-

As a long time registered Professional Engineer (PE) & consulting engineer in Missouri & Ohio & several other states, I hereby call on the federal gov't to totally clean up this site like the Nuclear Regulatory Commission & EPA did with Cincinnati's Fernald waste & like they are about to start at the contaminated SE Ohio Ironton/Portsmouth heavy water contaminated portion of an Indian reservation near the Ohio River-

The Weldon Springs encapsulation & monitoring precedent should be used here -since many more persons are at long term risk here, than in the Weldon remediated area- Please do a proper cleanup in this alluvial flood plain-





IS MD 631

PM 07 L



23 USA  
Carsbad Covers National Park, NM

Debbie Kring  
Community Involvement Coordinator  
EPA Region 7  
901 North 5<sup>th</sup> St.  
Kansas City, Kansas 66101

37  
A USPS 7000 recycled

1332 Riverside  
St. Louis Mo 63130  
April 4, 2008

Dear Ms. Kring,  
The West Lake Landfill in St. Louis is located in the Mississippi floodplain. It is the source of our drinking water. It has dangerous carcinogenic waste in it. It should be moved if not out of town to a suitable location - but to a suitable location in Missouri equipped to handle this waste. It should not be left in the floodplain. Even a 500 yr. levee which protects it can fail.

Sincerely,  
Dorinda Hudson Kennell



Grizzie2@aol.com  
04/07/2008 03:13 PM

To: Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc  
Subject: West Lake Landfill

Debbie Kring  
Community Involvement Coordinator  
EPA region 7,  
901 North 5th St.  
Kansas City, Kan. 66101

Dear Ms. Kring: This is written to implore EPA to clean up the West Lake landfill located in the North St. Louis County from the radioactive waste presently found there. I have two vantage points to make this request. First I am presently Chairman of the Board of the Great Rivers Environmental Law Center. The Center has been involved in constantly monitoring the Missouri River flood plain and its environs. The danger posed is in large measure by reason of the proximity to the intake structure that provides drinking water to north st. louis county residents. The landfill has been in a constant state of eroding and blowing into the St. Louis environment

The other vantage point I have is as former City Attorney for the City of St. Louis in the 1980s. In that capacity I was involved with the efforts to clean up the radioactive waste dumped there in the conclusion of the Manhattan Project on grounds of St. Louis Lambert Airport. the dangers were brought home to me then.

The same dangers, even magnified, are present with Westlake landfill.

I hope that the EPA will take corrective action to provide for the safety of St. Louis residents. Thank you for any consideration you can give to this request.

James J. Wilson  
7711 Bonhomme  
Clayton Mo. 63105

(314) 351-5660 (h)

Planning your summer road trip? Check out [AOL Travel Guides](#).

Rec'd by Hand Copy  
on April 7, 2008

6571 Arsenal St  
St. Louis, MO 63139

April 4, 2008

Ms. Debbie King  
Community Involvement Coordinator  
US EPA Region 7  
901 North 5th St  
Kansas City, KS 66101

Dear Ms. King:

I am writing in regards to the 200 acre West Lake Landfill Superfund Site "Proposed Plan," where thousands of cubic yards of highly radioactive waste have been since ~~there~~ they were illegally dumped in 1973. This area is just  $8\frac{1}{2}$  miles upstream from the public water intake for St Louis, where I live.

There is no liner underneath the site and radioactive waste have already been getting into the groundwater which flows into the Missouri river.

Thorium-230, Uranium-238, and Polonium-210 are all in West Lake. Exposure can lead to thyroid malfunction, cancer and birth defects, and also immune & reproductive problems. If a levee broke, these highly radioactive substances would be everywhere in St Louis via the water. Every living being would be ~~be~~ at high risk for health problems.

Moreover, since there has been development in the Chesterfield area, more strain on the ~~rest~~ nearby waterways ~~with~~ results, putting the levees under greater strain and the area + people more vulnerable.

Proper clean up with dust suppression tents (with negative pressure and filters) should be done.

(The clean-up really should have been done when the airport, Mallinckrodt and Latty Avenue/Hazelwood sites were done.)

St Louis is a large city and there are many other cities downstream! The health of lots of people deserves a safe and thorough clean-up of the ~~rest~~ radioactive material.

Just putting rubble and clay on top doesn't prevent radioactive dust + radon gas from escaping.

You are in your position to do the right thing for the community of St Louis. That means getting us proper protection from radiation. I ask you to do this job thoroughly, as if you lived here too.

Sincerely + respectfully,

Pamela Hosler

Pamela Hosler 314-512-755

Rec'd by mail  
4/8/08

April 4, 2008

Dear Ms. King,

We are concerned about the radioactive waste at West Lake Landfill getting into our drinking water. We want the

wastes transported as far away from people and water as possible.

Many thanks,  
Janet & Bernard Becker  
4498 Laclede Ave.  
St. Louis, MO 63108



lmcbelt@aol.com  
04/07/2008 04:45 PM

To Debbie Kring/R7/USEPA/US@EPA, tritium3@sbcglobal.net  
cc  
bcc  
Subject West Lake Landfill

Ms. Kring: Thank you for helping my wheelchair bound son and I find seats at the March 27 public meeting at Bridgeton.

I am fully in support of the comments made by Kat Logan-Smith of the Coalition for the Environment, Bruce Moore of the Environmental Law Center, Kay Drey and all the others who asked that the radioactive wastes be removed from the West Lake landfill. Sure, the landfill is located behind a strong levee. Sure, it didn't fail in the 1993 flood. There is no way this levee is guaranteed not to fail in a really big flood. Even if it does not fail, there is no way you can guarantee that ground water will not carry radioactivity to the St. Louis County and St. Louis City drinking water inlets. Barium sulfate is radioactive.

You represent an organization which ultimately depends on the confidence and support of citizens of the state of Missouri and the nation. How can you depend on that support if you do not even make groundwater data available to the public? The record of decision should not be made without that data having been perused by citizens, not just your own hydrologists.

Remember that it was illegal to dump the radioactive material in 1973. Why compound the illegality, why earn the mistrust of the citizenry by just leaving that radioactive stuff there? Remember that nature doesn't care how FEMA describes a flood plain. Institutional controls, deed restrictions, special caps and covers won't matter in 30,000 or 40,000 years. The Community Task Force recommended a clean up. Why are you even entertaining the idea of NOT cleaning up?

The original levee at Earth City was an agricultural levee. It is now higher and theoretically stronger. We don't really know. The USACE did not oversee the construction of this levee. Even if they had, there is no guarantee that this levee will be forever safe.

Excavate, transport the waste to a federally licensed disposal facility. I have five children and 20 grandchildren. I want them to know that it will always be safe to drink the County and City water from the Missouri River. Safe for their great great grandchildren, too. Louise M. Belt

Get the [MapQuest Toolbar](#), Maps, Traffic, Directions & More!

Please transport  
West Lake radioactive April 6, 2008  
wastes as far away  
from the ~~Flourissant~~  
Valley + Bridgton as possible.

Dear Mrs. King,

The Flourissant Valley including  
West Lake and Bridgton once had the  
richest and most fertile topsoil in  
the United States for agriculture. Then,  
as the land was sold, the topsoil  
was stripped from the land and  
sold. Garbage dumps and nuclear  
waste sites abused the land. Locally  
grown, organic foods are fast becoming  
the thing <sup>to</sup> do across America. Flourissant  
Valley is now deprived of having  
what could have been some of the  
best and healthiest <sup>locally grown</sup> foods in the  
nation because of its once rich soil  
filled with nutrients was taken  
and poisoned and polluted. From  
all the wastes Flourissant Valley  
waters also have become contaminated.  
Early missionaries and settlers once  
called the Valley the "Holy  
Land" because of its beauty, <sup>scenic</sup>  
solitude and agricultural  
fertility. Please return  
Flourissant to the "Holy Land" it was

Such is the Florissant Valley, in extent some two by twelve miles, Florissant being French for "blooming" or "flourishing," the apt name which the early Creole habitants found from the beginning for this genuine garden-spot of Missouri.

## Florissant Valley of the Flowers

"Spiritual not material achievement is the core of Florissant history. The triumphs of industry and trade cannot compare to the spiritual culture, humanitarian effort, missionary zeal and educational enterprise that are part of the Florissant Valley's past. Early missionaries called it the 'Holy Land.'" (Excerpt taken from Saint Ferdinand de Florissant by Gilbert Garraghan, S.J.)

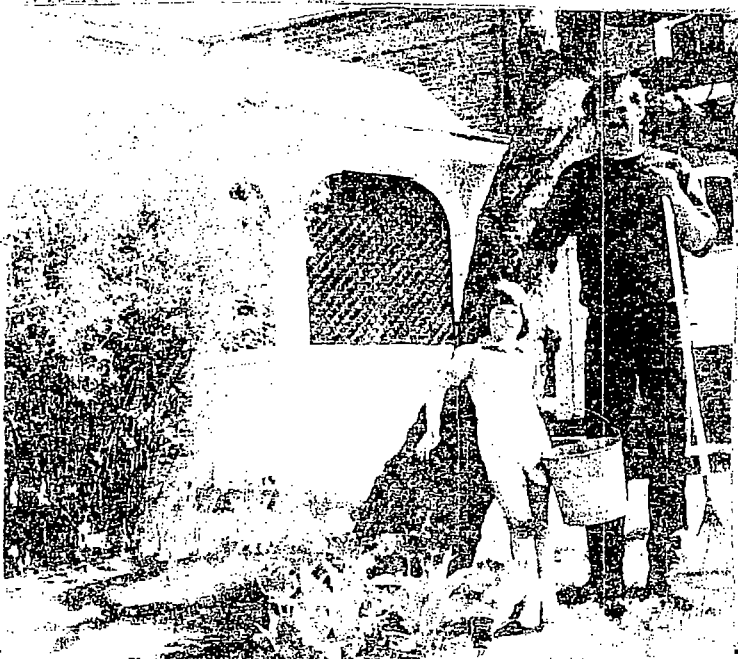


"Returning at an angle of forty-five degrees with the road by which he approaches, a ride of a dozen miles up the Missouri places the traveller upon a bold roll of the prairie from which, in the beautiful valley below, rising above the forest, appear the steep roofs and tall chimneys of the little hamlet of Florissant. Its original name was St. Ferdinand, and though one of the most advanced in years, it is by no means the most antique looking of those ancient villages planted by the early French. Its site is highly romantic upon the banks of a creek of the same name and in the heart of one of the most fertile and luxuriant valleys ever subjected to cultivation. The village now embraces about thirty or forty irregular edifices somewhat modernized in style and structure, surrounded by extensive corn-fields, wandering flocks of Indian ponies and herds of cattle browsing in the plain."

Mrs. Charles (Jane) Chambers has this first-hand description of the Florissant Commons. "The Florissant Commons afforded a fine range for horses, cows, hogs belonging to the inhabitants of the village. It was well wooded affording fine shade and every villager cut all the firewood or house logs he needed for it. Wild roses and a variety of flowers adorned these prairies and an abundance of strawberries and blackberries and many apples were to be gathered at will." Letter to Walter H. Hill, S. J., June, 1878.

So indeed did it appear to Bradbury, the naturalist, who passed along here in 1836. ~~The soil is fertile to a degree, being a rich, heavy loam of inky blackness, as pictured by Timothy Flint, the Congregationalist clergyman, who in the twenties of the last century wrote up the agricultural possibilities of Missouri for the benefit of Eastern readers.~~

"About fourteen miles to the northwest of St. Louis is the small village of St. Ferdinand. It contains about sixty houses; most of them are situated on a rising ground, at the foot of which is a considerable stream of pure water, and on the opposite side is one of the most fertile and valuable prairies in the Country. . . . The prairie in the vicinity of St. Ferdinand is about twelve miles long and two miles broad and is so situated as to be of great utility to the inhabitants. It extends nearly parallel to the Missouri and from one to two miles from it. The plantations on each side of the prairie are so laid out as to embrace considerable portions of it as also the necessary woodlands. Considerable settlements are formed along the border of it. Those extensive ones in the long point formed by the junction of the Mississippi and Missouri are near the lower end of it and those at Marais des Liards are at the opposite extremity. These settlements are wealthy, the people industrious and the lands cultivated by them of the first quality.



excerpts taken from  
Saint Ferdinand de Florissant - G.J Garrag



taken from

### ❖ ORGANIC FOODS ARE A KEY TO HORMONE BALANCE

Organic foods are grown in uncontaminated soil without pesticides of any kind (including herbicides, fungicides, and insecticides), without chemical fertilizers and additives, and without sewage sludge. Also, they are not genetically engineered. Organic farmers have found over the years that healthy soil produces healthy plants, which contain an abundance of natural substances that allow them to better resist diseases and pests.

Fruits and vegetables that are conventionally grown are low in nutrients, hybridized, sprayed, and fertilized in a manner of xenohormonic pesticides and other poisonous compounds. Nonorganic farming leaves soil depleted of the minerals it needs to produce healthy, pest-resistant crops. Those hardy plants that can be eked out of this used-up soil need plenty of xenohormonic fertilizers and pesticides. The hybridization of crops—which is what makes those uniformly large, flawless-looking veggies you see in the supermarket produce section—means further exhaustion of nutrient content.

Our food crops today have half the nutrients of crops grown a century ago, and we consume less food than our ancestors (who spent much of the day at hard physical labor). Factor in generally poor digestion and the fact that we tend to cook the nutrients out of our vegetables, and add in the large amounts of processed food that have replaced whole foods, and you have a setup for poor health: the low nutritional intake of the average person in an industrialized culture.

Meats and dairy products are even more tainted by conventional farming methods. Enormous factory farms raise cattle and pigs jammed into pens that deny them exercise and sun-

Their feed falls far short of being anything you'd want to put in your own belly. If you are what you eat, you're also what whatever you eat eats. In some instances cattle are fed old newspapers that other cattle have urinated on, or a mishmash of oils, waste from crops, and unsalable parts of their slaughtered brethren. On such a dietary regimen, livestock are generally unable to fight off infections and are maintained on a steady diet of antibiotics to keep them alive. Then they are given hormones to artificially fatten them up. Range-raised cattle, on the other hand, are naturally lean. The fats found in the meat of a cow that has been grazed in open pasture are stable and saturated, whereas the meat of cattle raised in factory farms contains a bizarre not-found-in-nature conglomeration of polyunsaturated and saturated fats, chemicals, and hormones. Conventional chickens and dairy cattle are raised under similar conditions, and their eggs and milk contain the poisonous stuff they are fed.

Xenohormones (e.g., pesticides) contained in the foods (such as grains) fed to livestock are concentrated in the fat, which means you're getting a relatively potent dose when you eat fatty meat. The bottom line here is that whenever possible, use only organic meats, eggs, and dairy products. If you're on a tight budget and can only afford to buy some of your foods as organics, these are the ones you should choose. Look for free-range, hormone-free and drug-free eggs, dairy, meats, and chicken.

If you do drink milk, be sure to get it from cows that are not given bovine growth hormone, known as rBGH, which is used to force the cows' bodies into producing higher quantities of milk. Milk from cows given rBGH has higher levels of pus (an indication of infection) in their milk, and we really have no idea of what long-term consequences of its use may

The importance of good, pure soil →

**ST. LOUIS COUNCIL ON ENVIRONMENTAL  
HEALTH AND SAFETY**

**P.O. BOX 150678 • ST. LOUIS, MO 63115 • 863-3330  
457**

**PRESIDENT & FOUNDER  
BERNARD C. RANDOLPH SR. M.D.**

April 7, 2008

Debbie King, Community Involvement  
Coordinator, EPA Region 7  
901 North 5th Street  
Kansas City, Kan. 66101

Dear Ms. King:

This letter is in support of the recommendation of the Missouri Coalition for the Environment that radioactive wastes be removed from the West Lake Landfill with appropriate precautions to prevent environmental dispersal. The current state of flooding in Missouri has accentuated this urgent need.

Our membership supports your continuous efforts to protect our environment and water supply from radioactive contamination.

Sincerely,




Bernard C. Randolph Sr, MD

BCR:AG



Daniel  
Wall/SUPR/R7/USEPA/US  
04/02/2008 10:40 AM

To DanMcKeel2@aol.com  
cc Debbie Kring/R7/USEPA/US  
bcc  
Subject Re: Hazardous Waste versus Municipal landfill design 

Dr. McKeel,

Thank you for the comment. You did misunderstand my meaning, and perhaps I did a poor job of explaining my point. Let me try again.

The remedy will require that the landfill cover, at a minimum, meet the Missouri municipal solid waste design. The design will be augmented, as necessary, to address the radiological concerns, i.e., the cap will be of sufficient thickness to shield the gamma radiation; and, the compacted clay component will also serve as radon barrier. These are the same methods used at mill tailing sites and other disposal sites with rad waste. This is what I was trying to say at the meeting. We are also requiring the addition of an armoring layer to enhance longevity and serve as a marker layer.

Let me also briefly weigh in on your points:

You are correct. There is indeed a difference between Municipal solid waste landfill design and hazardous waste landfill design. The former derives from the Resource Conservation and Recovery Act (RCRA) Subtitle D rules, and the latter derives from the RCRA Subtitle C rules. Briefly, the conventional Subtitle D design relies on natural materials and the low permeability component in the liner and cover is a compacted clay layer. The conventional Subtitle C design uses flexible membrane liners (made of HDPE). The Subtitle C design includes a double lined leachate collection system. There are no Subtitle C landfills in Missouri.

There is no RCRA hazardous waste in the West Lake Landfill, i.e., no listed chemicals, or chemicals that are flammable, corrosive, mobile or highly toxic. The West Lake Landfill is most like a municipal solid waste landfill, which is why the Subtitle D design is considered more appropriate. In addition, the Subtitle D design is more compatible with rad waste disposal which typically relies on natural material designs because of the longevity considerations. The FMLs don't have adequate design life.

You are correct that RCRA landfills don't accept waste streams that are classified rad waste. But this is a regulatory distinction. There are no technological reasons that Subtitle D design cannot be adjusted (as indicated above) to account for a rad waste component. It also requires that the groundwater monitoring program include the appropriate radiological parameters and the long-term monitoring and maintenance be performed for as long as the disposal site remains.

I hope this helps.

Best regards,

Dan Wall  
913-551-7710

DanMcKeel2@aol.com



DanMcKeel2@aol.com  
04/02/2008 05:33 AM

To Daniel Wall/SUPR/R7/USEPA/US@EPA  
cc DanMcKeel2@aol.com  
Subject Hazardous Waste versus Municipal landfill design



Dear Dan,

I heard you tell the public at the recent West Lake Landfill open meeting there was no significant difference in the design of Municipal (solid waste) and Hazardous Waste landfills. My research following the meeting shows this was not a fair or accurate statement. Specifically, hazardous waste landfills are built with double composite liners, no commercial hazardous waste landfills are located in Missouri, and those across the United States, including the Peoria, IL, hazardous waste landfill do not accept radioactive materials at all. Certainly rad waste is NOT accepted knowingly at any municipal landfill. Those facts should have been conveyed to the public by EPA in defending their position to cap and leave in place forever the WLL Cotter-Mallinckrodt rad wastes in OU-1 areas 1 and 2.

I must address this issue in my comments on WLL to be submitted by April 9. First, I wanted to provide you a chance to explain or correct your statement, if I understood your remark on 3/27/08 in Bridgeton that no significant differences exist between the design of hazardous waste and municipal landfills.

Thank you,

Sincerely,

-- Dan McKeel 4/2/08

Daniel W. McKeel, Jr. MD  
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\*\*\*\*\*

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DanMcKeel2@aol.com  
04/09/2008 09:28 PM

To Debbie Kring/R7/USEPA/US@EPA  
cc DanMcKeel2@aol.com  
bcc  
Subject West Lake Landfill 3/27 extended comments

**MEMO**

To: Debbie Kring  
Community Involvement Coordinator  
EPA Region 7  
901 North 5th Street  
Kansas City, KS 66101  
E-mail: Kring.Debbie@epa.gov

From: Daniel McKeel, M.D.  
5587-C Waterman Blvd.  
St. Louis, MO 63112  
Phone: 314-367-8888  
Fax: 314-367-7663  
E-mail: danmckeel2@aol.com

Date: April 9, 2008

Subj: Extended comments on West Lake Landfill 3/27/08 meeting (Attached 7 page PDF)

-----  
The attached 7 page PDF file represents my extended written addendum to my oral remarks at the March 27, 2008, Bridgeton public meeting concerning the West Lake Landfill (WLL) flood plain and related issues.

These are submitted in response to EPA's invitation to participate in the open public comment period on WLL from 3/27-4/9/08.

Thank you for the additional opportunity to express my point of view on this important matter.

Daniel W. McKeel, Jr. MD  
MAIL: 5587-C Waterman Blvd., St. Louis, MO 63112  
E-MAIL: danmckeel2@aol.com  
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\*\*\*\*\*

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WLL\_McKeel\_4.9.08.pdf

EXTENDED COMMENTS ON WEST LAKE LANDFILL  
FLOOD PLAIN ISSUES & PUBLIC MEETING  
-- Daniel W. McKeel, Jr., M.D., April 9, 2008 --

This comment will extend my oral remarks made to U.S. EPA Region VII at the Bridgeton, MO, public hearing on West Lake Landfill held on 3/27/08. The bolded portions represent my oral presentation at the meeting, while the not bolded text represents my extended comments for the written record.

WEST LAKE LANDFILL

Public Meeting 3/27/08

Dan McKeel Oral Comments

**Good evening – I am Dan McKeel, a retired Washington University School of Medicine faculty Pathologist. I have been involved with the West Lake Landfill Proposed Plan and ROD since June 2006 and have attended all of the EPA and MDNR-sponsored public meetings related to WLL remediation during 2006-2007. My previous remarks at these meetings supported another remedy from the “capping” remedy that EPA has selected. Rather, I advocate excavation of the radioactive wastes from WLL OU-1 areas 1 and 2, with transport out of state to a licensed federal facility.**

**I do not believe that Alternative 4 is fully protective of the public health and the environment for multiple reasons:**

ADDED COMMENT – The West Lake Landfill is not designed to safely contain radioactive wastes by any criteria of any regulatory agency (NRC, EPA, DOE, MDNR). Yet very hot nuclear weapons waste from Mallinckrodt Chemical Works Uranium Division was dumped there illegally by Cotter Corp. in 1973. The public was not protected from these wastes in any manner for the next 3.5 decades even though the WLL radionuclides were characterized by the early 1980s. This is truly shameful and represents gross negligence. Nearby residents in Spanish Village, daily workers at Earth City, and trash haulers employed at other parts of the landfill were placed at high risk. Now there is an opportunity to correct all of this by excavating and removing the rad waste to a licensed federal facility such as the representative from ENERGY

SOLUTIONS (merged with Envirocare) outlined at the 3/27/08 public meeting in Bridgeton. Yet a half-way remedy was selected that will fully protect no one.

**(1) Recent torrential rains and floods in ten Midwest states, that rivaled in intensity the 1982 and 1993 historic floods, clearly showed us that flood plain sites like WLL are in serious jeopardy. Such violent rainstorms can relocate radioactive soil within the confines of the landfill itself and cause runoff from the steep slopes. Next time the Missouri River may experience even more extensive flooding. This real danger has been marginalized by both EPA and MDNR and they have even disputed, without justification, that the landfill is actually located in a Missouri River floodplain. I find this fact to be astounding!**

ADDED COMMENT -- Not only is WLL not a licensed facility designed for radioactive waste disposal, it is in the Missouri flood plain, despite the nonsensical claim by EPA this is not so. WLL is protected by levees of a type that have recently been shown to fail during hurricane Katrina in New Orleans, during the floods of 1982 and 1993 in Missouri, and will certainly fail in the future – the question is not IF, but WHEN will the levee failure occur?

**(2) WLL is unlined and is not a hazardous waste landfill designed to contain radioactive waste.**

ADDED COMMENT – My research indicates that although some municipal landfills designed similarly to WLL do accept radwaste, the trend is towards reducing such dangerous practices. Murphreesboro, TN, for example, recently discontinued the practice appropriately citing safety concerns. Research revealed no U.S. hazardous waste landfills are licensed to accept radwaste of the WLL type.

**(3) Remediation of the very high levels of thorium-230 (117 pCi/gm) and other radioactive wastes from WLL soil has been delayed since 1973 when Cotter Corporation illegally dumped the materials in the municipal landfill.**



ADDED COMMENT – Addressed in introductory remarks. I must reiterate that everything I know about the nuclear industry, including interaction with the nuclear weapons legacy and current communities and workers therein, as well as with NRC and other agencies that regulate nuclear waste, tells me that EPA's endorsement and MDNR concurrence to leave the WLL rad waste in place violates good science, good sense, and the letter and spirit of safety guidelines for the public and the environment. Such decisions discredit both fine agencies, EPA and MDNR, and their very noble missions to above all protect the public health and safety and the environment.

Dan Wall's response to my question about the current role of the NRC in WLL was not satisfactory. He alluded to there being "a letter" at some time in the past from NRC to EPA saying it was OK for EPA to take over radiologic management of WLL. I call upon EPA to release and furnish a copy of this letter to me and to make it public as part of the OU-1 and OU-2 ROD. It should be part of this document. I question this non-involvement of NRC at WLL being cognizant of the situation at the former nuclear fuels plant in Hematite, MO, that is now owned by Westinghouse but built by MCW. The Court vacated a Consent Decree between Westinghouse, MDNR and Attorney General Jay Nixon's office because they had somehow overlooked NRC's claim that in Missouri, which is not an NRC agreement state, NRC has exclusive jurisdiction over management of radioactive wastes rather than MDNR. I won't believe Mr. Wall's assertion that NRC has no (zero) current role at WLL unless and until the letter he described from NRC to EPA is put into the public record where I and others can see it.

I also strongly object to EPA's repeated statements that minimize the risk of storing this particular rad waste, that contains progeny of Belgian Congo ore with 60-65% uranium. To do so is misleading to the public. This is detrimental to the public's safety and well being on several levels (medical and economic).

**(4) Adopting Alternative 4, by capping but not removing the WLL rad waste offsite, is shortsighted and merely delays solving this major environmental contamination problem.**

ADDED COMMENT – Capping remedy #4 is a temporary solution to the radioactive wastes at WLL. The cost to excavate and move offsite will rise as the years go by. EPA and St. Louis County Government, as well as MDNR, underestimates the fact that one day a major lawsuit will

probably be filed to force removal of the waste. That event will increase the cost of leaving the WLL waste in place enormously. I anticipate that with the next State and national elections looming, the regulatory climate to be “business friendly” at the expense of the public health and safety will change dramatically.

**(5) EPA and MDNR have misrepresented the difficulty of suppressing dust and other airborne emissions were the WLL rad wastes to be excavated and transported offsite. Portable buildings with negative pressure filters and other similar technologies are widely used and can fully protect the nearby residents of Spanish Village and the 17,000 people who work at Earth City.**

ADDED COMMENT – I regard this type of deliberate ignoring and misrepresentation of the facts by a knowledgeable federal agency with plentiful expert resources as a serious breach of the public trust. Anyone familiar with Superfund/CERCLA, FUSRAP and other hazardous waste remediation activities is aware that numerous technologies and well established operational strategies are available to safely excavate and remove dusty potentially airborne wastes from sites like WLL. Portable buildings and HEPA negative filtration units, exhaust fans and hoods plus protective personal gear for workers are in routine use throughout the country. EPA possesses this knowledge and should have made this known at the WLL public meetings. Not doing so invites the belief that EPA is biased towards the lowest cost option. It causes the public to not believe EPA, Gene Gunn and Dan Wall when they declare that “cost was not a factor in remedy selection.” I and others believe that it clearly was.

An example of removal of dusty radioactive wastes was in 1993, when ERG of Albuquerque, NM removed over 800 rail cars full of radioactive magnesium-thorium sludge safely, without incident, from the old Dow Chemical site in nearby Madison, IL.

Mrs. Drey circulated to the WLL interested parties additional information about dust containment technologies for excavating wastes such as those at WLL. This information was ignored by EPA officials at the 3/27/08 public meeting. I hope it will be addressed in the Response Summary to this WLL OU-1 and OU-2 ROD.

**(6) A group of concerned citizens met with the St. Louis County Executive in September 2006 to express their concerns about WLL and the EPA-MDNR favored “capping” alternative. We were assured that talks would be initiated with US EPA Region VII, the lead agency, and that all those around the table would be party to this “open dialog” that the County Executive espoused. The Directors of the St. Louis County Departments of Health and Environmental Services attended the meeting. Nor has the St. Louis County Council stated their preferred WLL remedy.**

**We were then told by the County Executive’s office that US EPA had refused to hold the promised talks until after the ROD had been issued. This made no sense to me.**

ADDED COMMENT – Please see comment to item #7.

**(7) During 2007, our group tried to schedule repeated appointments to discuss the position of St. Louis County Government and the various WLL alternatives under the Proposed Plan. Officials were either unavailable or simply failed to appear at the scheduled times.**

ADDED COMMENT – Our treatment was rude beyond words. The facts speak loudly as to the true intentions of St. Louis County in this matter which is a deplorable hands off, we don’t want to get involved attitude. The County Executive promised that meetings would be held and a dialogue established about WLL issues among interested members of the public, St. Louis County Health and Environmental Services, and U.S. EPA Region VII, but this never materialized. It is extremely disappointing to learn that EPA allegedly, according to the County, refused to meet and talk until after the ROD was issued. What possible good would that do? None that I can see is the answer. Overall, way too little, too late would be the way I would characterize the actions of EPA and St. Louis County regarding WLL.

**(8) We then wrote to Mr. Askew, EPA Region VII director, concerning an announcement of the unusual issuance of the WLL ROD before new groundwater characterization studies had been undertaken. I asked when the new groundwater data would be made available to the public.**

ADDED COMMENT – The reasoning and facts offered in this letter were convoluted and not fully congruent with the facts as I know them. A source inside MDNR told a private citizen that “new groundwater studies” were to be undertaken as the primary reason the WLL ROD had been delayed. Mr. Askew’s letter implies that no new groundwater studies were done, and does not explain clearly why the ROD was delayed.

**(9) Finally, this meeting was held and the public comment period was reopened for a brief time, welcome news indeed.**

ADDED COMMENT –

(a) The information offered about the levee system was both interesting and, according to Mrs. Drey’s testimony, self-serving in that the original levee design was not approved by the Army Corps of Engineers. Rather it is a private levee system. The statement that I read into the record on 3/27/08 in Bridgeton from the 1990 EPA NPL narrative, to the effect that WLL lies in the Missouri River flood plain, abolishes the validity of the technical nit-picking by EPA and others that this is untrue. They are incorrect and the position that WLL is not in a flood plain is absurd given EPA’s own official description of the site.

(b) Missouri Senator Bond’s office was identified as a major reason the 3/27/08 WLL public meeting was held. A representative from the Senator’s office was present but chose not to illuminate those in attendance what the Senator’s concern about WLL being located in the Missouri River flood plain was based upon in greater detail. I am certain all present would have been interested in hearing such an explanation.

(c) I was frankly disappointed that the newly reassessed groundwater studies that I was led to believe had caused the delay in issuing the initial OU-1 and OU-2 ROD were not described at all at the 3/27/08 meeting. I say this even though I understand there will be a separate groundwater ROD at some distant point.

A major point of concern that I and others, including the Missouri Coalition for the Environment and Kay Drey, have often stated, is that WLL groundwater has already migrated offsite. EPA and MDNR dispute this fact that we believe is contradicted by existing WLL site data. For example, a background well once occupied the site of the current St. Louis Rams

McKeel extended comments on West Lake Landfill 4/9/08

Training Center in Earth City. That well had elevated radionuclides above accepted background levels for non-impacted sites that contain radioactive wastes.

EPA has maintained all along that radioactive waste at WLL is confined to the upper twenty feet of OU-1 areas 1 and 2 landfill mass. Thus, if as we contend, groundwater has been radioactively contaminated beyond the strict confines of WLL, then the selected capping remedy 4 is even less satisfactory. There is no barrier to impede the downward migration of the barium sulfate, thorium-230, polonium-210 and other rad wastes at WLL. This is true because WLL was designed like a municipal landfill rather than a hazardous waste landfill. Such hazardous waste landfills contain a double liner and a leachate collection system that facilitates routine monitoring of the contaminants from effluents in contact with landfill contents. This is not possible, nor is it done, at WLL that lacks a leachate monitoring system.

Engineered "disposal" cells that are designed to contain radioactive materials, such as the DOE structure that EPA Region VII and Mr. Wall oversee in St. Charles County, MO, have much thicker caps to contain radon emanation. Concerning radon at WLL, Mr. Wall seriously misstated the true facts about radon at WLL at the 3/27/08 Bridgeton meeting. In response to an audience question, Mr. Wall stated that radon was formed and was gone in three days due to decay. What is wrong with this, of course, is that radon gas is given off continually by a steady stream of coincident and successive radiologic decay events. Thus, radon escaping from WLL to the air is a constant occurrence and concern in the absence of an effective barrier. WLL has three feet, whereas the 45 acre Weldon Spring cap built by DOE at a taxpayer cost to the public of over \$900 million for active remediation, is 300 feet thick.

**My more extensive written comments will follow. Thank you.**

ADDED COMMENT -- My oral and extended written comments on WLL flood plain and related issues were submitted 4/9/08 via Fax/E-mail with hard copy to follow.

Respectfully submitted,

***DANIEL W. MCKEEL, JR., M.D.***

Daniel W. McKeel, Jr., M.D.

5587-C Waterman Blvd., St. Louis, MO 63112

Phone: 314-367-8888 • Fax: 314-367-7663 • E-mail: danmckeel2@aol.com

# Missouri Coalition for the Environment

6267 Delmar Blvd. Suite 2E, St. Louis, MO 63130, (314) 727-0600

Ms. Debbie Kring, Community Involvement Coordinator  
U.S. EPA, Region VII  
901 N. 5th St.  
Kansas City, KS 66101  
Via Email: [kring.debbie@epa.gov](mailto:kring.debbie@epa.gov); [wall.daniel@epa.gov](mailto:wall.daniel@epa.gov)

April 9, 2008

RE: Comments on Proposed Plan for West Lake Landfill Superfund Site, Bridgeton, MO

Dear Ms. Kring:

Thank you for this opportunity to again address the EPA's Proposed Plan for the West Lake Landfill.

I submit these comments on behalf of the Missouri Coalition for the Environment, our members, and board. I reiterate our comments dated December 29, 2006 previously submitted on this issue and incorporate them by reference. I provide additional comments herein.

The groundwater risks at the West Lake Landfill are insufficiently characterized at the site to draw the conclusions of risk and safety that the EPA has drawn. As noted previously, the high-level, radioactive and radiotoxic materials dumped at the site in 1973 are not contained in any meaningful way.

The waste is sitting in the alluvial floodplain, atop groundwater (and *in* groundwater) that flows toward private wells, the Missouri River, and public drinking water intakes on the Missouri River as detailed in the December 29, 2006 comment letter and the documents pertaining to this site. Notably, the Feasibility Study Report on the West Lake site submitted to the EPA by Paul Rosasco of Environmental Management Support Inc. dated May 6, 2006 admits this major deficiency in characterizing risks of the site:

**"the RI [Remedial Investigation] was neither designed to, nor considered all of the investigations and evaluations that would be required to support definitive conclusions about the potential for contaminants to leach to groundwater over time. Therefore, leaching of radionuclides and possibly other chemicals such as metals or VOCs, to groundwater is considered to be a potential pathway of concern."**  
(P. 20)

And again:

"The results of the RI investigations indicate that the radiological and non-radiological contaminants present in the OU-1 waste materials may not be fully contained." (P. 21) ... "Therefore, **leaching to groundwater** represents a potential migration pathway to be address [sic] by the remedial actions that may be taken at the Site." (P. 21)

Despite the fact that the Remedial Investigation (RI) did not fully investigate and explore groundwater contamination, the EPA concludes the groundwater is safe. How can this be?

The Proposed Plan draws conclusions with inadequate and insufficient data to support those conclusions. For example, Figure 2-9 in the Feasibility Study shows that at least 11 monitoring wells on the perimeter of the site are noted as "no longer exists" and one is noted as damaged. That shows that the EPA is relying on **1 monitoring well** on the western edge of Area 2 (and none on the north side, though groundwater flows northwest toward the Missouri River) from which to draw broad conclusions that groundwater is safe. Whatever information that might be gleaned from perimeter monitoring cannot be accessed now, old data cannot be verified, and current conditions cannot be monitored for changes over time. Why do these wells that would demonstrate migration of contaminants toward the Missouri River via groundwater off site no longer exist? Why have they not been replaced?

In the public hearing, EPA staff repeatedly claim that no contaminated groundwater plume exists or that no plume is moving off-site. How adequate is the groundwater monitoring network when one entire side of the most contaminated part of the site is unmonitored? What data does the EPA rely on? Is it data from these non-existent wells?

Groundwater is not only present in the river alluvium soil. The Feasibility Study admits that groundwater is also present in the bedrock (p. 9). What evidence does the EPA rely on to conclude that bedrock aquifers are 1) not impacted by radiotoxic materials; and 2) not likely to be impacted by radiotoxic materials?

The risk assessment did not address irrigation scenarios from groundwater either for the dreamed-of vineyard to the east or the crop lands to the west. Nor did it address risks when floodwaters carry radionuclides onto crop fields. The risk assessment took a very short view of very long-lived wastes. Thus, it was inadequate and should not guide decisions about this site.

### **Water Moves Radionuclides**

The EMS Feasibility Study states that a berm "on the northern portions of Area 2 controls runoff to the adjacent properties..." which are the Ford and Crossroads properties including the Buffer Zone (p. 6). However, adjacent properties are contaminated because nothing "controls" the runoff. The "control" is inadequate, as the Feasibility Study admits: "During major storm events, a very small portion of Area 2 can potentially drain down the landfill berm onto the Ford property." (P. 7). In fact, the same study notes that the adjacent properties now have **3,600 cubic yards** of eroded material containing radionuclides from the surface of West Lake Area 2 (p. 12) in just 35 years. What volume can we expect to erode leaving the waste on site for thousands of years?

The Feasibility Study also describes erosion of surface sediments occurring *on site*: "An additional 17,200 square feet in the northeastern portion of Area 2 contains soil/sediment eroded from the surface of Area 2." (p. 12) And the Feasibility Study offers still more evidence of erosion: "Occurrences of radionuclides were found in surficial (6-12 inches or

less) **soil at the toe** and immediately adjacent to the landfill berm as a result of the historic erosion from Area 2." (p. 12)

Radionuclides on the surface at the toe of the landfill poses a concern as well because Missouri DNR Director Doyle Childers admits in a February 21, 2008 letter that floodwaters would be "just touching the toe of the landfill at Area 2" if the Earth City levee was breached by a flood the size of the '93 flood. That suggests that a levee failure, however improbable in the short-term (and however likely in the 10,000-700,000 year time frame), would bring floodwater in contact with radionuclides for future generations.

The Feasibility Study also describes the site as being located "2 miles east of the river". The site is actually ½ mile closer to the river than the Feasibility Study states. If the 2-mile assumption figures into the EPA's risk assessments – particularly those relating to groundwater - they must be adjusted to fit reality. Does this impact EPA's calculations on the number and type of domestic and irrigation wells within a certain range? Residents in St. Charles County who rely on alluvial wells downstream from West Lake are concerned that they may face some risks if contaminated groundwater reaches them.

EPA must revisit its Proposed Plan and investigate options that would remove the radioactive waste from the Missouri River floodplain and contain it away from water and away from people. The hazardous lifespan of these poisons extends hundreds of thousands of years into the future. Whatever the limits of our knowledge, they do not excuse us from our responsibility to act on the knowledge we have today. And we know this:

- The atomic weapons wastes at West Lake will be dangerous for more than 700,000 years.
- The wastes are toxic, cause cancer, and cause genetic damage in animals and humans.
- The wastes are this generation's responsibility.
- Humans rely on floodplains for growing crops and building settlements.
- Humans rely on rivers for drinking water and irrigation.
- Humans use groundwater for drinking water and irrigation.
- These realities have been true for millennia and are unlikely to change, therefore

**the radioactive waste should not remain in the Missouri River floodplain.** Instead, it should be carefully removed, and stored at a licensed waste repository where it is isolated and monitored.

Please keep me posted about activities and decisions regarding this site.

Yours truly,

Kathleen Logan Smith, Executive Director





Kay Drey  
<tritium3@sbcglobal.net>  
04/10/2008 07:27 AM

To Debbie Kring/R7/USEPA/US@EPA  
cc  
bcc

Subject a few mistakes in the comments I submitted last night --

Dear Ms. Kring,

April 10, 2008

I just noticed I had two mistakes in the comments I sent to you last night. I would greatly appreciate it if you would replace the original copy with the one I am attaching this morning. I apologize for the inconvenience.

- (1) I left out an "s" after 50 in the first numbered paragraph.
- (2) And I should have typed "St. Louis" in the fifth numbered paragraph.

Thank you, Kay



West Lake -- comments for EPA -- April 2008.doc

April 9, 2008

Debbie Kring  
Community Involvement Coordinator  
Region 7  
US Environmental Protection Agency

Dear Ms. Kring:

Although I have already testified and submitted statements regarding West Lake Landfill, I am submitting one more to try to explain why I believe the EPA's Record of Decision should declare that the highly radioactive nuclear weapons production wastes secretly and illegally dumped at the landfill 35 years ago should be removed.

1. Quite probably few sites exist anywhere that are less stable than the floodplain of the flood-prone Missouri River. Belgian Congo uranium ore residues, processed by Mallinckrodt Chemical Works in the 1940s and 50s, are in that floodplain, at West Lake.

Even the US Nuclear Regulatory Commission mandates that a near-surface radioactive waste disposal site "must minimize to the extent practicable the contact of water with waste." (Code of Federal Regulations, Title 10, Part 61.51)

2. West Lake is located in the highly populated Metropolitan St. Louis area, directly upstream from two major St. Louis City and North County drinking water intake and distribution facilities, and upstream from the Missouri River's confluence with the Mississippi that provides basic water needs for the nation's southern states, and beyond.

Employees at major St. Louis County employment centers, including Boeing and Earth City, get their drinking water from the Missouri River only eight miles downstream from the landfill.

3. *Radioactive materials at West Lake will continue releasing radioactive particles and rays for many thousands of years. They include isotopes ranked among the most dangerous known, including thorium-230, polonium-210, radium-223 and -226, and lead-210 --- as well as dangerous isotopes not detected in American uranium ore residues, including protactinium-231 and actinium-227.*

4. The EPA proposal to leave the wastes with no barrier between them and the groundwater --- with the top merely covered with construction rubble, rocks, and clay --- would provide neither current nor lasting protection. Radioactive gases and dust would readily escape through cracks that develop in the cap and through spaces on all sides.

5. All the other St. Louis sites contaminated with Mallinckrodt Chemical Works wastes have been or are being cleaned up by the US Army Corps of Engineers. Why not West Lake, too?

6. The federal government is paying for the remediation of all the other Mallinckrodt nuclear weapons waste sites in Metropolitan St. Louis, including one billion dollars expended at Weldon Spring. Why not West Lake, too?

Sincerely, Kay Drey

April 9, 2008

Debbie Kring  
Community Involvement Coordinator  
Region 7  
US Environmental Protection Agency

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## Plutonium hitchhikers take the fast stream

Page 1 of 2

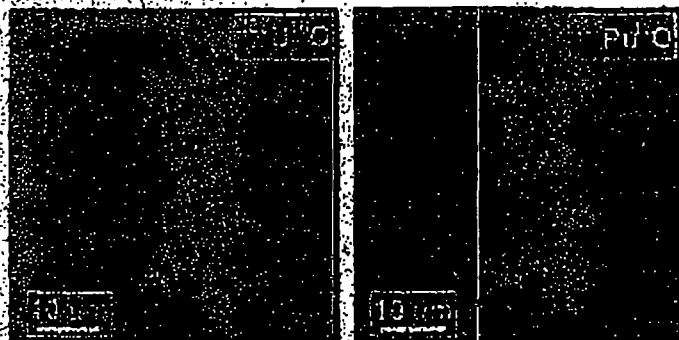
## Plutonium hitchhikers take the fast stream

26 October 2006

RSC | Advancing the  
Chemical Sciences  
Chemistry World

The radioactive element plutonium can travel through groundwater despite its low solubility; it hitches a ride on tiny colloid particles in the water.

Russian, American and French researchers have imaged plutonium clinging to mineral colloids around four kilometres away from a contaminated lake near a nuclear waste processing plant in Mayak, Russia.



Elemental maps of trace U and Pu on amorphous Fe hydroxide colloids from groundwater 3.2 km from the contaminated source, Lake Karachai, in Mayak, Russia. (The contrast of these maps has been enhanced to show the distribution clearly; intensity does not correspond to concentration of the different elements.)

© Rodney Ewing

The team's findings support earlier studies of radionuclide migration through water. A US group led by geochemist Annie Kersting reported in 1998 that plutonium, and other radioactive isotopes, might use colloids to travel unsuspected distances from underground nuclear testing sites in Nevada. It wasn't clear then exactly how this happened.

Now says co-author Rodney Ewing, from the University of Michigan, US, researchers have identified the colloids responsible, at least at Mayak. They used high-resolution microscopy to identify iron oxide phases carrying plutonium from Lake Karachai, contaminated by a nuclear fuel reprocessing spill half a century ago.

The small colloids are ubiquitous to groundwater, Ewing explained. They form weak bonds with amorphous plutonium hydroxide, which has limited solubility in water. Ewing hopes the team's findings will settle some debates about the importance of colloids as a transport mechanism for plutonium and other actinide elements. Some scientists suggest that organic matter, dissolved in water, might also offer plutonium a useful taxi service.

Little can be done about plutonium's spread around Mayak and similarly contaminated sites. But plans to store nuclear waste underground may need to consider the possibility of colloidal transport.

European storage programmes in Finland and Sweden pack tight clay (bentonite) around copper and cast iron casks holding nuclear waste. This provides a barrier to water and colloid transport of radionuclides, explained Charles McCombie, an advisor on international nuclear waste management programmes. In the UK, similar cement-like barriers would encapsulate steel or concrete containers, said John Dalton of Nirex, an independent organisation advising the government on nuclear waste storage.

But the US waste programme doesn't propose any clay barrier, said McCombie. The US plan is to store nuclear waste at Yucca Mountain, Nevada, in containers which would last for thousands of years, while water is diverted round storage tunnels.

Richard Van Noorden

**Plutonium hitchhikers take the fast stream**

**References**

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A. Novikov *et al.*, *Science*, 2006, **314**, 638.

A. Kersting *et al.*, *Nature*, 1999, **396**, 56

**Comment: Out of sight, out of mind?**

The recent recommendations from the Committee on Radioactive Waste Management should prompt a renewed research effort to tackle the problems of nuclear waste storage.

**Bury radioactive waste, UK government told**

Radioactive waste should be stored deep underground at sites where local communities have had the opportunity to participate in, and even withdraw from, the planning process.

**Going underground**

Many countries consider that the best way to dispose of nuclear waste in the long term is to bury it deep underground. Simon Morgan looks at how this could be done

**West Lake Landfill Radioactive Contamination**

Radionuclide	Sampling Location	Details	In Nature	NRC Reference	West Lake Soil	West Lake Groundwater	West Lake Surface Water or Runoff	West Lake Sediment	Source
*not all nuclides were tested in samples in all media									
<b>Th-230</b>	WL-106	Surface			9,700 pCi/g				RIR Table B-1
Thorium-230	WL-114	Surface			7850 pCi/g				RIR Table B-1
Daughter of U-238	WL-209	Surface	1	5	29,240 pCi/g				RIR Table B-2
Highly Toxic		5 ft. deep			38,280 pCi/g				RIR Table B-2
	WL-210	Surface			18,190 pCi/g				RIR Table B-2
		5 ft. deep			12,400 pCi/g				RIR Table B-2
	WL-230	5 ft. deep			26.8 pCi/g				RIR Table B-2
	WL-231	5 ft. deep			94.5 pCi/g				RIR Table B-2
	WL-233	27 ft. deep			427 pCi/g				RIR Table B-2
	WL-234	10 ft. deep			57,300 pCi/g				RIR Table B-2
	WL-243	Surface			265 pCi/g				RIR Table B-2
	Weir 2							215 pCi/g	RIR Table E-1
	Weir 5							770 pCi/g	and Table D-1
	Weir 6							68.8 pCi/g	RIR Table E-1
	Weir 8					9,200 pCi/liter			RIR Table D1
	Weir 9					204 pCi/liter		1,160 pCi/l	and E1
<b>Pb-210</b>	WL-234	10 ft. deep			1,300 pCi/g				RIR Table B-2
Lead-210	WL-209	5 ft. deep			1,170 pCi/g				RIR Table B-2
Daughter of U-238	WL-210	Surface			1,370 pCi/g				RIR Table B-2
Parent of Polonium 210	WL-124	Surface			950 pCi/g				RIR Table B-1
	WL-114	Surface			206 pCi/g				RIR Table B-1
		2.5 ft. deep			740,000 cpm				
	Weir 8						9,200 pCi/liter		RIR Table D-1
	D-6	Deep Well				204 pCi/liter			RIR Table C-3
<b>Ra-226</b>	WL-209	Surface			3720 pCi/g				RIR Table B-2
Radium-226	D-14	Deep Well				96.7 pCi/liter			RIR Table C-3
Daughter of U-238									
<b>Th-234</b>	S-5	Shallow well				178 pCi/liter			RIR Table C-3
Thorium-234	I-68	Intermediate well				101 pCi/liter			RIR Table C-3
Daughter of U-238	D-12	Deep well				114 pCi/liter			RIR Table C-3

<b>Pa-231</b> Protactinium-231 Daughter of U-235	WL-209	Surface	2030 pCi/g	RIR Table B-4
		5ft. Deep	1930 pCi/g	RIR Table B-4
	WL-210	Surface	838 pCi/g	RIR Table B-4
	WL-234	10 ft. deep	1050 pCi/g	RIR Table B-4
	WL-106	Surface	544 pCi/g	RIR Table B-3
<b>Ac-227</b> Actinium-227 Daughter of U-235	WL-114	Surface	156 pCi/g	RIR Table B-3
	WL-209	Surface	1320 pCi/g	RIR Table B-4
	WL-210	Surface	732 pCi/g	RIR Table B-4
	WL-234	10 ft. deep	952 pCi/g	RIR Table B-4
	WL-106	Surface	305 pCi/g	RIR Table B-3
<b>Ra-223</b> Radium 223 Daughter of U-235	WL-114	Surface	118 pCi/g	
	WL-234	10 ft. deep	891 pCi/g	RIR Table B-4
	WL-106	Surface	293 pCi/g	RIR Table B-3
	WL-114	Surface	113 pCi/g	RIR Table B-3

### Downhole Gamma Readings

To interpret these data one needs to know the background counting rate of the gamma detector at sea level above a clean surface and also in a borehole in clean soil.

Gamma radiation-no particular nuclide		10 counts per minute (cpm) at surface in MO	
PVC-111	3 ft. deep	2,288,000 cpm	RIR Table 6-9, Table 6-11
PVC-38	10 ft. deep	1,298,000 cpm	RIR Table 6-7, Table 6-11
PVC-4	1 ft. deep	1,290,000 cpm	RIR Table 6-9
WL-233	22 ft. deep	69,000 cpm	RIR Table 6-9
WL-234	7 ft. deep	1,104,000 cpm	RIR Table 6-11
WL-209	1 ft. deep	740,000 cpm	RIR Table 6-9
WL-210	Surface	420,000 cpm	RIR Table 6-11
WL-211	1 ft. deep	330,000 cpm	RIR Table 6-9
PVC-7	2 ft. deep	1,385,000 cpm	RIR Table 6-9
PVC-10	3 ft. deep	753,000 cpm	RIR Table 6-9
	10 ft. deep	152,000 cpm	RIR Table 6-9

## ENGINEERING MANAGEMENT SUPPORT INC.

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April 9, 2008

U.S. Environmental Protection Agency  
Region VII  
901 N. 5<sup>th</sup> Street  
Kansas City, Kansas 66101

**ATTENTION:** Ms. Debbie Kring

**SUBJECT: Comments on Proposed Plan  
West Lake Landfill Operable Unit 1, Bridgeton, Missouri**

Dear Ms. Kring,

On behalf of Cotter Corporation, Bridgeton Landfill, LLC. (f/k/a Laidlaw Waste Systems (Bridgeton), Inc.), and Rock Road Industries, Inc. (the private party Respondents), Engineering Management Support Inc. (EMSI) provides these comments following U.S. EPA's third public meeting, held March 27, 2008, on the Proposed Plan for Operable Unit 1 (OU1) of the West Lake Landfill Site.

As U.S. EPA is aware, the Respondents fully support the June, 2006 Proposed Remedial Plan for the West Lake Landfill Site, and are prepared to begin negotiating a settlement document and design plan for this remedy once U.S. EPA issues a Site Record of Decision (ROD). The Respondents urge U.S. EPA to sign the ROD as soon as possible.

Although the Respondents understand U.S. EPA's mandate to engage in a full and fair public comment process, of approximately 100 people in attendance at the March 27 meeting, only 8 identified themselves as Bridgeton residents. The public comment window for this proposed remedy effectively has been open for 22 months now, and the public, including local residents, have had ample opportunity to make their views known to U.S. EPA.

The Respondents also observe that U.S. EPA's purpose in holding the third public meeting was to provide additional information concerning flood conditions, levees and flooding protection for the Site. The specialists who made presentations on March 27 from U.S. EPA, the U.S. Army Corps of Engineers, and the Earth City Levee Protection District accomplished this task very well. In contrast, many of the individuals who spoke at the March 27 meeting diverged from the topic and simply repeated opinions already presented for the Site's administrative record or offered statements which had little to do with the Site and its cleanup options.



With respect to the potential for flooding to affect the proposed remedy, the Respondents believe that evaluation of potential flooding, if any were to occur, and assessment of such flooding on the toe of the landfill cover can be performed as part of the remedial design activities. These evaluations can be used to determine the need for and design of any reinforcement of the landfill toe and how such reinforcement would be integrated with or possibly replace the rock/debris layer proposed for inclusion in the landfill cover.

The remedy selected by U.S. EPA in the June, 2006 Proposed Plan meets the threshold requirements specified by the National Contingency Plan (NCP) – protection of human health and the environment and compliance with applicable and relevant and appropriate requirements (ARARs). This remedy also best meets the balancing criteria specified by the NCP, which include long-term effectiveness and permanence, reduction in toxicity, mobility and volume, short-term effectiveness, implementability and cost. U.S. EPA can, and should, issue a ROD selecting this remedy for the Site. Such a result will satisfy repeated requests from the Respondents and many local residents that U.S. EPA end the Site's study phase and allow the actual Site remediation work to begin.

If you have any questions or desire additional information related to these comments, please do not hesitate to contact me.

Sincerely,  
**ENGINEERING MANAGEMENT SUPPORT, Inc.**



Paul V. Rosasco, P.E.

**Distribution:**

Shawn Muenks – Missouri Department of Natural Resources  
Victoria Warren - Allied Waste Industries, Inc.  
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