West Lake Update August 9, 2017

Progress on Proposed Remedy Decision

The West Lake Landfill Superfund Site is one of EPA's top priorities in the entire country. The new administration has made a concerted effort to restore Superfund to its rightful place at the center of EPA's core mission. The West Lake Landfill team remains singularly focused on identifying and proposing a final, permanent remedy that will protect the citizens of Bridgeton and the surrounding communities.

EPA Region 7 and its federal and state partners have completed their review of the first draft Remedial Investigation Addendum (RI Addendum) and Final Feasibility Study (FFS) reports. In addition to EPA Region 7, the multi-agency review team includes experts from EPA Headquarters, EPA Office of Research and Development, St. Louis and Kansas City Districts of the U.S. Army Corps of Engineers, Missouri Department of Natural Resources, Missouri Department of Health and Senior Services, and U.S. Geological Survey. This multi-agency approach requires some additional time to gather, compile, and reconcile the comments, but it adds significant value to the end product.

EPA received the draft reports at the end of 2016 and early 2017, and sent comment letters to the Potentially Responsible Parties (PRPs) on the first draft of the RI Addendum in March and April 2017. In these letters, EPA directed the PRPs to further address key areas to support EPA's remedy decision, such as distribution of the radiologically-impacted materials (RIM) throughout Areas 1 and 2, exposure scenarios in the Baseline Risk Assessment, groundwater characterization, and inclusion of more recent site data. In response to the comment letters sent by EPA, the PRPs submitted a revised RI Addendum report in June, which is currently undergoing review by EPA and the multi-agency review team.

After completing the review of the revised RI Addendum, EPA Region 7 and its federal and state partners turned their attention to the draft FFS. The multi-agency review team conducted a thorough review, and EPA sent comments on the draft FFS to the PRPs in June. In the comment letter, EPA directed the PRPs to address items critical to the remedy selection process, such as legal requirements that a remedy must achieve in accordance with CERCLA, cleanup objectives, evaluation of the landfill cap designs, and further consideration of an industrial worker partial excavation alternative. A revised FFS report is due from the PRPs in August 2017, which will then undergo a multi-agency review as well.

EPA is evaluating several alternatives at the site for a final remedy. Descriptions of those alternatives are shown in the table below. In the FFS, each alternative will be evaluated against the <u>nine criteria in the National Contingency Plan</u>.

Alternatives

1. No Action (evaluated as a comparison to alternatives below)

2. Various partial excavation scenarios, taking into consideration depth, concentration, and land use

3. Full Excavation

4. Cap in Place

Finalization of the RI Addendum and FFS report is an iterative process. While EPA has not announced a new schedule for the proposed remedy decision, we will keep the public informed on our progress through routine updates. We will use the graphic below to il-

PROGRESS TO A PROPOSED REMEDY



lustrate our progress. In the meantime, the Agency will work closely with elected officials, Community Advisory Group, and others in the community to ensure that the Agency's actions are transparent, and that the public is kept well informed of progress at the site.

North Quarry Update

Air sampling results from the PRPs and the state of Missouri continue to demonstrate the absence of radionuclides in the air above levels of concern. It is important to remember that any air sampling, taken anywhere in the country, will register some amount of radionuclides due to natural background levels. The levels of radionuclides picked up by the PRPs' air monitoring stations are generally consistent with EPA's own previous, year-long monitoring effort at five off-site locations, including one



Newly installed EVOH cover in the North Quarry of the Bridgeton Landfill.

placed in Spanish Village. EPA previously concluded that our off-site air monitoring for radionuclides indicated levels are consistent with urban background levels.

The subsurface smoldering event (SSE) in the south quarry of the Bridgeton Landfill remains at least 700 feet away from the radiologically impacted material (RIM) in Operable Unit 1 (OU1), as measured by the temperature monitoring probes (TMPs) located in the neck area of the landfill, and as illustrated on the <u>landfill active</u> <u>settlement map</u>.



Newly installed EVOH cover in the North Quarry of the Bridgeton Landfill.

Substantial progress has been made in installing components of the isolation barrier system required under the 2016 North Quarry Time-Critical Removal Action. This effort is designed to prevent the SSE from potentially impacting the RIM located in OU1 of the West Lake Landfill.

The installation of the Heat Extraction System (HES), additional TMPs, and the expansion of the ethylene vinyl alcohol (EVOH) cover are important components of the system. The 26 new heat extraction wells and 17 new TMPs are installed and operational. Contractors under EPA oversight are currently overseeing the expansion of the EVOH cover, which is progressing ahead of schedule. EPA expects this field work to be complete by the end of summer 2017.

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