



West Lake Update

Proposed Plan and Public Comment Period

March 2, 2018

EPA Selects “Excavation Plus” as Proposed Remedy for West Lake Landfill

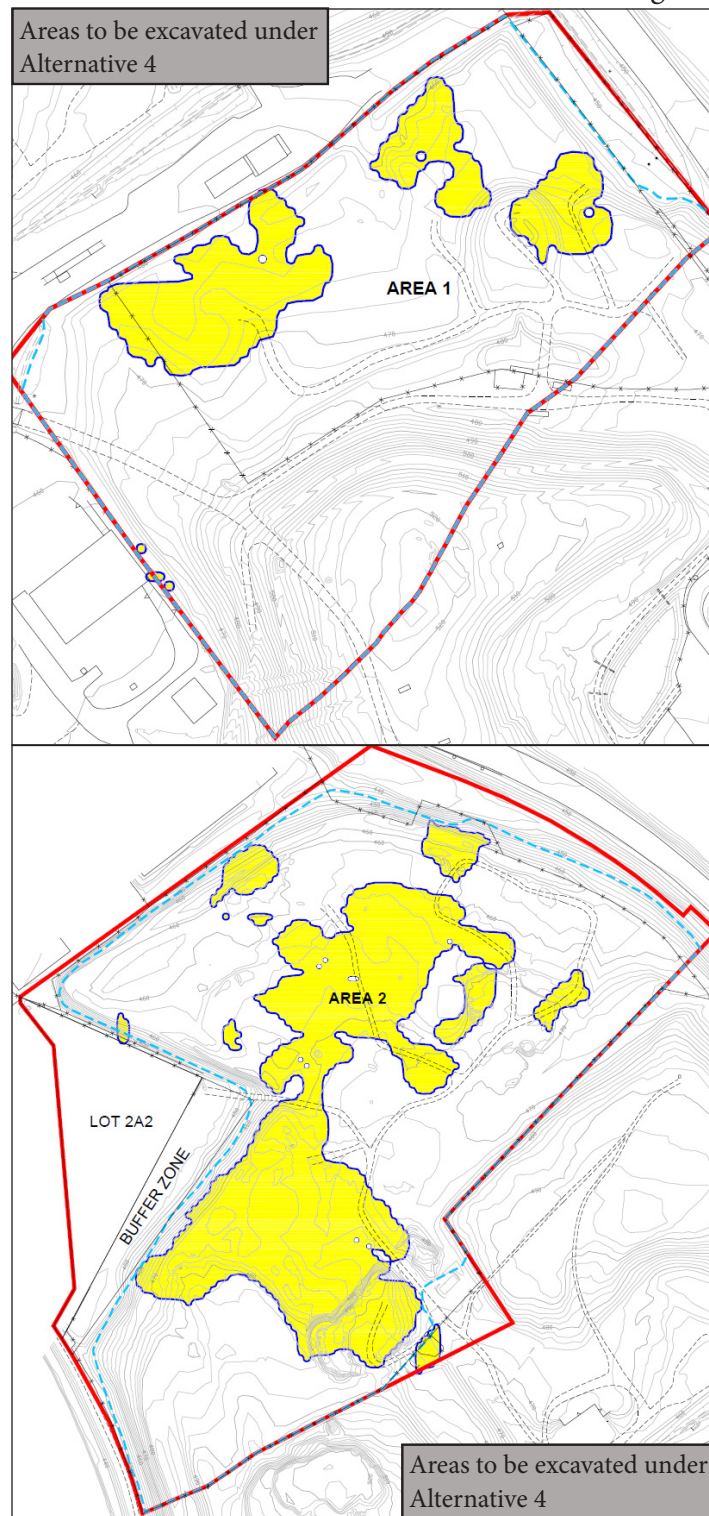
On Thursday, February 1, 2018, EPA Administrator Scott Pruitt announced his decision to propose excavation to remove radioactively impacted material (RIM) from the West Lake Landfill in Bridgeton, Missouri. Known as “Excavation Plus,” the proposed remedy will remove a majority of the radioactivity from the landfill while protecting on-site workers, the surrounding community, and groundwater at the Site.

The preferred alternative to amend the 2008 Record of Decision for the West Lake Landfill Superfund Site, referred to as Alternative 4 in the Proposed Plan, would excavate RIM with a concentration greater than 52.9 picocuries per gram (pCi/g), to a maximum depth of 16 feet. This excavation will remove approximately 67 percent of the radioactivity from the landfill, which is the main driver of human health risk at the Site and will significantly reduce the threat posed by the Site. In addition, this excavation alternative does not impact Bridgeton Landfill infrastructure or require excavation of Bridgeton Landfill wastes which limits the potential for a subsurface heating event or landfill fire in the North Quarry portion of the Bridgeton Landfill. EPA’s preferred alternative minimizes impacts to the community such as odors, dust, and traffic compared to deeper excavation alternatives.

After excavation, a low permeability cover will be installed in Area 1 and Area 2 to prevent future direct contact, reduce radon and gamma emissions to acceptable levels, and significantly reduce or prevent leaching of radioactive materials to groundwater. Excavation of a majority of the radioactivity, in combination with installation and maintenance of an engineered cover, results in the prevention of unacceptable risks in the future. These long-term residual risks may be further reduced through optimized replacement of the overburden prior to installation of the landfill cover.

The concentrations of radioactive materials will be reduced in the upper 16 feet of Area 1 and Area 2 to

less than 52.9 pCi/g. The remaining deeper radioactive material has very little potential to cause an exposure at the surface even if the cover would be damaged. Excavation of this material creates additional challenges.



After implementation of the remedy, the Site will be subject to Five Year Reviews by the EPA. Five-year reviews require EPA to evaluate the performance of a remedy to determine whether it remains protective of human health and the environment.

The proposed remedy has an estimated cost of \$236 million, and will take approximately five years to complete. The Potentially Responsible Parties (Bridgeton Landfill LLC, Rock Road Industries LLC, Cotter Corporation, and the Department of Energy) are liable for the costs associated with the West Lake cleanup.

The Proposed Plan is available online: <https://semspub.epa.gov/work/07/30352175.pdf>

Public Comment Period February 6 through April 23

The EPA is seeking comment on all alternatives presented in the Final Feasibility Study (FFS). The public is encouraged to provide comments regarding the criteria EPA considers when evaluating remedial alternatives which include long term effectiveness, reduction in toxicity, mobility, or volume through treatment, short term effectiveness, implementability, and cost effectiveness.

Based on a request from a member of the public, the comment period has been extended and now runs from February 6 through April 23, 2018. There are three ways to submit written comments during the public comment period:

- Submit comments via email to: R7_WestLakeLandfillPublicComments@epa.gov
- Submit written comments postmarked no later than April 23, 2018 to: Benjamin Washburn, Office of Public Affairs, EPA Region 7, 11201 Renner Boulevard, Lenexa, KS 66219.
- Submit comments via the online form: <https://www.epa.gov/mo/forms/west-lake-landfill-public-comment-period>

The EPA is specifically soliciting comments related to the depth and concentration criteria (16

feet depth limit and the 52.9 pCi/g concentration) established as a baseline for Alternative 4 as well as on the selection of different depths and concentration criterion between Area 1 and Area 2. The EPA is also inviting comments on the disposal options for the excavated radioactive material. The EPA encourages the public to comment on both on- and off-site disposal options as a component of the proposed plan.

Following the comment period, the EPA, in consultation with the Missouri Department of Natural Resources, will make a final decision on amendment of the Operable Unit-1 Record of Decision after reviewing and considering all comments and any new information submitted during the public comment period. The EPA may modify the preferred alternative or select another response action based on new information. Therefore, the public is encouraged to provide comments on all the alternatives presented in the Proposed Plan.

The Administrative Record file, including the Remedial Investigation Addendum and FFS reports, is available on the EPA's website at <https://semspub.epa.gov/src/collections/07/AR/MOD079900932>. The EPA encourages members of the public to review these documents to obtain facts about the Site and the activities that have been conducted as part of the Superfund remedial process.

Public Meeting

The EPA has scheduled a public meeting to provide information about EPA's preferred alternative and accept oral comments on the Proposed Plan for March 6, 2018, from 6:00 p.m. to 9:00 p.m. at the District 9 Machinists Hall, 12365 St. Charles Rock Road, Bridgeton, Missouri. The EPA will provide a brief presentation, followed by the public comment session beginning at 6:30 p.m.

The EPA encourages the public to register in advance by contacting Ben Washburn, community involvement coordinator, at washburn.ben@epa.gov or 913-551-7364. Written comments may also be submitted at the meeting.

Community Inquiries

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