REGION 7
LENEXA, KS 66219

Mr. Paul V. Rosasco
Project Coordinator
Engineering Management Support, Inc.
25923 Gateway Drive
Golden, Colorado 80401

Dear Mr. Rosasco:

On December 22, 2023, Parsons submitted the revised Field Sampling Plan (FSP) Addendum 9 for the West Lake Landfill Site on behalf of the West Lake Landfill Operable Unit 1 (OU-1) Respondents. The EPA has completed our review of the FSP Addendum 9 and is approving the document with a few text modifications. The EPA supports the consideration of historical aerial photography along with the existing data included with FSP Addendum 9 and believes this provides a well-founded approach that will likely identify the extent of RIM in the North Surface Water Body sufficient to complete the design of the OU-1 Remedy.

EPA notes that no schedule for the completion of this work was provided with FSP Addendum 9. EPA reminds the respondents that the schedule for the Pre-final (90%) Remedial Design and the Final (100%) Remedial Design report is specified in the July 2022 Remedial Design Modified Statement of Work (SOW) and it is not dependent on the completion of FSP Addendum 9 work.

Please feel free to contact me with any questions or concerns by phone at (913) 551-7416 or by email at mahler.tom@epa.gov.

Sincerely,

THOMAS MAHLER

Digitally signed by THOMAS MAHLER
Date: 2024.02.01 15:16:06 -06'00'

Tom Mahler
Remedial Project Manager
Remediation Branch
Superfund and Emergency Management Division

Enclosure:
cc: Ryan Seabaugh, Missouri Department of Natural Resources

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Field Sampling Plan Addendum 9 Modifications

1. **Section 1.2, pages 1 and 2.** The sediment data currently available do not provide sufficient basis to delineate the vertical and lateral extent of RIM in the North Surface water body. FSP Addendum 9 proposes additional data collection needed to fully delineate RIM. While the EPA expects this work will further define the extent of RIM in this area, the results of these new samples may require additional step-outs. Therefore, to prevent confusion regarding this topic, delete and/or modify the following sentences from Section 1.2:

   (a) delete the fourth sentence in the second paragraph of Section 1.2 on page 1;

   (b) revise the last sentence in the second paragraph of Section 1.2 on page 1 to read, "*Based on these samples and others, the vertical extent of RIM has not been delineated in the NSWB.*"

   (c) modify the first full sentence at the top of page 2 as follows, "*The results in NWB-SED-02-R were highest (14.1 pCi/g) and exceeded the RIM definition in the deepest interval sampled (from 2 to 3 feet bml).*"

   (d) modify the last sentence of the paragraph at the top of the page as follows, "*NWB-SED-04-R1, which was offset from the originally planned location, had a combined thorium concentration of 12 pCi/g in the deepest interval sampled (3 to 3.5 feet bml) which is above the definition of RIM.*"

2. **Section 1.4.1, page 2, last paragraph.**
   (a) Replace the word "*impacts*" in the first sentence with "*RIM*".

   (b) Replace the fourth sentence in this paragraph with the following, "*The samples will be analyzed for radium and thorium isotopes to identify RIM.*"

3. **Section 1.4.2, page 3, first paragraph.**
   (a) Replace the word "*depths*" in the second sentence with "*elevations*".

   (b) The EPA expects that fill material and sediment in filled locations outside of the current water body may have been compacted to provide a competent soil surface. Thus, the depth of competent soil may not provide a reasonable basis to identify the appropriate maximum depth for these borings. Therefore, replace the fourth sentence with the following, "*The last two samples will be collected at 1-ft intervals at an elevation no less than two feet below the competent soil elevation beneath the water body. The competent soil elevation is to be determined from the installation of the additional borings described in Section 1.4.1.*"

   (c) Replace the last sentence in this paragraph with the following, "*These samples will also be analyzed for radium and thorium isotopes to identify RIM.*"