



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

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

Dear Mr. Rosasco:

On September 22, 2023, Parsons submitted a revised Field Sampling Plan (FSP) Addendum 11 for the West Lake Landfill Site on behalf of the West Lake Landfill Operable Unit 1 (OU-1) Respondents to propose the collection of additional data for the delineation of Radiologically Impacted Material (RIM) greater than 7.9 pCi/g and Municipal Solid Waste (MSW) for the OU-1 final cover design based on comments in the EPA's June 22, 2023 letter regarding the draft Design Investigation Evaluation Report (DIER). This addendum was revised and resubmitted to the EPA on September 28, 2023.

The EPA's July 14, 2023 conditional approval of the extension request for the revised DIER required that the respondents submit a revised figure(s) depicting the maximum extent of RIM based on data and information associated with the DIER and EPA comments. In that letter the EPA acknowledged that the maximum extent of RIM could potentially be reduced in the future if the Respondents chose to do additional sampling. The EPA has completed our review of FSP Addendum 11 and finds that it proposes to drill additional borings and collect additional samples that would serve a purpose consistent with the statements in the EPA's July 14, 2023 letter summarized above. The EPA notes that FSP Addendum 11 states its results will be summarized in a future addendum to the DIER. Therefore, the EPA approves the revised FSP Addendum 11 with the following conditions: (1) the future DIER addendum summarizing the results must at a minimum include the data results and a figure depicting the revised extent of RIM based on those results if changes are warranted and (2) the revised extent of RIM must be approved by the EPA prior to utilizing that extent in future OU-1 design deliverables. The EPA notes that the maximum extent of RIM which will also be included in the revised DIER is what future design deliverables, including the 90% RD, must address unless the EPA approves an alternative as described in condition (2). The EPA also reminds the Respondents that the 90% RD is due to the EPA within 75 days of EPA approval of the Revised Excavation Plan. The EPA will not grant an extension to the submission of the 90% RD related to any of the additional data collection proposed in FSP Addendum 11.

The EPA notes that the figure submitted in response to the EPA's July 14, 2023 request did not depict the maximum extent of RIM in certain areas where the Respondents have proposed additional borings. Based on this, the EPA will modify the figure to reflect the actual maximum extent of RIM as necessary. The EPA-modified figure will establish the extent of RIM until the Respondents provide additional data to justify a smaller maximum extent of RIM, if appropriate, based on the proposed borings.



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: 2023.10.06 18:26:19 -05'00'

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

cc: Ryan Seabaugh, Missouri Department of Natural Resources