



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

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June 21, 2016

Ms. Gay M. Fussell, Deputy Director
Westinghouse Electric Company
Hematite Decommissioning Project
3300 State Road P
Festus, MO 63028

Subject: Westinghouse Electric Company (WEC) Hematite Decommissioning Project –
Pre-sampling Notifications (PSN) and Confirmation Completion Summaries (CCS) for
LSA-08-01 through LSA-08-17

Dear Ms. Fussell:

The Missouri Department of Natural Resources (department) has completed review of the Pre-Sampling Notifications and Confirmation Completion Summaries (CCS) for LSA-08-01 through LSA-08-17. Project Remediation Goals (RG) for select Volatile Organic Compounds in soils have not been achieved in all tested areas. The Confirmation Completion Summaries indicate that residual subsurface soil contamination has been confirmed within each referenced LSA or in an adjacent LSA.

The CCS model format was initially developed to confirm surface conditions in areas thought to be free of contamination. An assumption was made in the model that “clean” surface conditions in a particular LSA was also an indication that VOC concentrations in subsurface soils would also be below RGs. Westinghouse has now determined that VOC contamination in subsurface soils is more extensive than had been identified in the Operable Unit 1 (OU1) Remedial Investigation. For that reason Westinghouse has decided to defer remediation of some of this additional material until NRC remediation criteria had been met. Site personnel now indicate that NRC soil remediation has been completed.

Department staff commented verbally on the PSN documents initially proposed to define final conditions in various LSAs. In response WEC collected additional subsurface samples as an effort to address department comments and to develop information that could later be used to estimate the location, volume, and mass of remaining VOC soil contamination. This expanded sampling program did identify additional volumes of soil contamination and has partially bounded the extent of remaining contaminated soil in the various Land Survey Areas. It is our belief that a comprehensive evaluation of the CCS data from all referenced LSAs including cross

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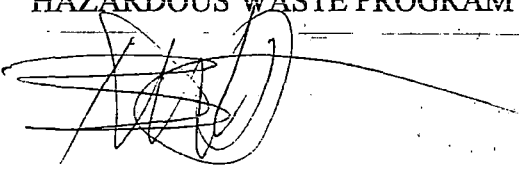
sectional drawings may indicate a need for additional investigation to better identify the limits of subsurface VOC soil contamination.

The Department again notes that the now-confirmed evidence of residual soil contamination above project Remediation Goals is a significant departure from the *Record of Decision for Operable Unit 1, Buried Waste, Impacted Soils and Sediment*, which requires the excavation and treatment or disposal of materials contaminated above project Remediation Goals. This being the case it is imperative that Westinghouse move forward with the department in developing an agreement detailing a CERCLA-defined path forward for continued investigation and remediation of remaining OU1 contamination as well as defining an approach to Operable Unit 2, investigation and remediation of groundwater contamination originating at the site.

If you have any questions, please contact me at (314) 877-3250 or (314) 810-3300, extension 330. Written inquiries can be directed to me at the Missouri Department of Natural Resources, 917 N. Highway 67, Suite 104 Florissant, Missouri 63031.

Sincerely,

HAZARDOUS WASTE PROGRAM



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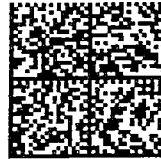
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