



Missouri Department of dnr.mo.gov  
**NATURAL RESOURCES**  
Michael L. Parson, Governor Dru Buntin, Acting Director

August 10, 2021

George Alexander  
Risk Analyst  
Division of Decommissioning, Uranium Recovery, and Waste Programs  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-001

RE: Solicitation of Missouri Department of Natural Resources' Comments on a Draft Environmental Assessment with a Finding of no Significant Impact Associated with the Sigma-Aldrich License Amendment Request (Docket No. 030- 10716)

Dear George Alexander:

The Missouri Department of Natural Resources appreciates the opportunity to review the draft Environmental Assessment (EA) associated with the Sigma-Aldrich Fort Mims Facility in Maryland Heights, Missouri. The Department offers the following comment for your consideration.

The draft EA summarizes the groundwater investigation and the maximum concentrations found in groundwater to be below the U.S. Environmental Protection Agency's (EPA) Maximum Contaminant Levels. The EA also summarizes that some areas of the site exceeds the Nuclear Regulatory Commission's (NRC) approved derived concentration guideline levels for radioactive contamination in soil. The EA does not include a summary of the activity concentrations found in these areas or explain if these areas are above the EPA/NRC Memorandum of Understanding Table 1 values for residential soil concentrations. The EA states that anticipated future land use is industrial. If the residual contamination exceeds residential values, we recommend an institutional control to ensure future land use is restricted to industrial use and that any contaminated soils are properly managed. We further recommend the EA or the Safety Evaluation Report describe the residual contamination in more detail and explain how it will be managed if future excavation disturbs the soil, or if land use changes.

This site has not been investigated for potential releases of hazardous substances associated with operation or disposal practices. The Department reserves the right to require further investigation of this site as needed.

If you have any questions or need clarification, please contact me at the Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102, by phone at 573-508-8597, or by email at [rob.hunt@dnr.mo.gov](mailto:rob.hunt@dnr.mo.gov). Thank you.

Sincerely,

Rob Hunt  
Senior Advisor

RH/man

