

US EPA ARCHIVE DOCUMENT

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President  
Central Region

October 13, 2006

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901 North 5th Street  
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RE: Comments on U.S. EPA's June 12, 2006 Westlake Landfill Site Proposed Plan

Dear Mr. Wall and Ms. King:

This letter shall serve as comments on U.S. EPA's Proposed Plan for Operable Unit 1 ("OU1") on the Westlake Landfill Site in Bridgeton, Missouri (the "Proposed Plan"). American Water Company ("AWC") generally supports EPA's proposed remediation measures, but submits these comments to emphasize the importance of conducting rigorous, long-term monitoring and implementing any necessary action to prevent the migration of any radioactive contamination to the Missouri River, a major source of St. Louis public drinking water.

Our review of the Proposed Plan and accompanying background documents leads us to conclude that EPA's remediation measures should, under present conditions, adequately contain the radionuclide contamination and isolate human receptors and the environment from such contamination. However, AWC is concerned about the potential mobility of the radioactive contamination in OU1. Because data shows several radionuclides and chemical contaminants present in the shallow groundwater beneath the site and relatively high levels of radioactive materials in the site soils, there is the potential for further leaching to groundwater and possible off-site migration.

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As you well know, OU1 of the West Lake Landfill is located in the Missouri River floodplain and is less than 2 miles from the Missouri River. Moreover, the groundwater beneath the West Lake Landfill flows toward the Missouri River. The Missouri floodplain is the source for the AWC's North County Treatment and Distribution Plant, and AWC's North County Water Intake is located at mile marker 20.5, approximately 8 miles downstream of the West Lake Landfill. AWC's North County Plant pumps twenty percent of the public drinking water to St. Louis County. Despite EPA's assertion that "groundwater transport of contaminants does not appear to be a significant migration pathway under current conditions," EPA cannot conclude that the impacted groundwater will not ever migrate off-site. Because of the proximity of the West Lake Landfill to a major source of St. Louis drinking water, AWC requests that EPA's Proposed Plan (1) include measures to periodically test the Missouri River for radioactive materials, beginning with an initial test to establish baseline levels; (2) better delineate its groundwater monitoring activities and include specific plans to address any migrating contamination; and (3) include procedures for keeping the public, and specifically AWC and other drinking water purveyors in the area, informed of monitoring activities and results. With respect to monitoring activities, AWC believes that strict compliance with Missouri's groundwater monitoring standards under its Hazardous Waste (Missouri Risk Based Cleanup Standards) and Water Protection Programs will best achieve these goals.

We thank you for your time and the opportunity to comment on the Proposed Plan. As mentioned above, we support EPA's efforts to efficiently address the radioactive contamination at the Site, provided EPA's selected remedy includes continuous monitoring of the groundwater at the Site to ensure that the contamination does not threaten any public water supply sources.

Very truly yours,



Terry L. Gloriod  
President