

US EPA ARCHIVE DOCUMENT

April 9, 2008

Debbie Kring
Community Involvement Coordinator
Region 7
US Environmental Protection Agency

Dear Ms. Kring:

Although I have already testified and submitted statements regarding West Lake Landfill, I am submitting one more to try to explain why I believe the EPA's Record of Decision should declare that the highly radioactive nuclear weapons production wastes secretly and illegally dumped at the landfill 35 years ago should be removed.

1. Quite probably few sites exist anywhere that are less stable than the floodplain of the flood-prone Missouri River. Belgian Congo uranium ore residues, processed by Mallinckrodt Chemical Works in the 1940s and 50s, are in that floodplain, at West Lake.

Even the US Nuclear Regulatory Commission mandates that a near-surface radioactive waste disposal site "must minimize to the extent practicable the contact of water with waste." (Code of Federal Regulations, Title 10, Part 61.51)

2. West Lake is located in the highly populated Metropolitan St. Louis area, directly upstream from two major St. Louis City and North County drinking water intake and distribution facilities, and upstream from the Missouri River's confluence with the Mississippi that provides basic water needs for the nation's southern states, and beyond.

Employees at major St. Louis County employment centers, including Boeing and Earth City, get their drinking water from the Missouri River only eight miles downstream from the landfill.

3. Radioactive materials at West Lake will continue releasing radioactive particles and rays for many thousands of years. They include isotopes ranked among the most dangerous known, including thorium-230, polonium-210, radium-223 and -226, and lead-210 --- as well as dangerous isotopes not detected in American uranium ore residues, including protactinium-231 and actinium-227.

4. The EPA proposal to leave the wastes with no barrier between them and the groundwater --- with the top merely covered with construction rubble, rocks, and clay --- would provide neither current nor lasting protection. Radioactive gases and dust would readily escape through cracks that develop in the cap and through spaces on all sides.

5. All the other St. Louis sites contaminated with Mallinckrodt Chemical Works wastes have been or are being cleaned up by the US Army Corps of Engineers. Why not West Lake, too?

6. The federal government is paying for the remediation of all the other Mallinckrodt nuclear weapons waste sites in Metropolitan St. Louis, including one billion dollars expended at Weldon Spring. Why not West Lake, too?

Sincerely, Kay Drey