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Mr. Daniel R. Wall
Project Manager
U.S. EPA - Region 7
901 North 5th Street
Kansas City, KS 66101

wall.daniel@epa.gov

Re: West Lake Landfill Superfund Site, Bridgeton, Missouri

Dear Mr. Wall:

These comments concern EPA's proposed plan for the West Lake Landfill Superfund Site in Bridgeton, Missouri. In particular, they address EPA's proposal to leave radiologically-contaminated materials in the floodplain.

Approximately two weeks ago, a graph prepared by Washington University's Robert Criss appeared in the St. Louis Post Dispatch. The graph showed that since construction of levees and wing dams began along the Mississippi River, the River has risen above flood stage more frequently, and has risen higher above flood stage than in earlier years.

A key issue for EPA here is whether it should defer to the Corps' and the Levee District's assessment that there is little risk that flood waters will reach the Landfill's contaminated waste. In light of the findings of Professor Criss, both the Corps and the Levee District would be hard-pressed to accurately assess the risk. Further, St. Louis University scientists predict that climate change will lead to 20% more rain, and 50% more water running through the river. On top of that the Corps continues to alter the river, approving and building levees and navigation structures. Even the Corps concedes it has not studied the cumulative effects of these structures on flood heights.

At the very least, the Corps has registered its concern over rising flood trends. In 1995, the U. S. General Accounting Office prepared a report to Congress on the performance, effects, and control of levees and reported:

> A continuing Corps study of Missouri River water levels shows that flow rates that once nearly filled the channel have been producing higher flood levels since the late 1920s. Similarly, a 1994 study of flow rates on the Mississippi and Missouri rivers found that flood levels for like flow rates have increased over time. . . . These trends concern the Corps . . .

With these concerns in mind, last year, upstream of the West Lake landfill site, a U.S. District Court ordered a stop to a Corps proposed levee, largely because other agencies would not defer to the Corps' judgment. This was after the United States Department of Interior told the Corps:

> It has been shown that more and larger levees are increasing the frequency and size of flood events. . . . We are disappointed that the Corps continues to not recognize these basic hydrology facts . . .

In that same case even EPA told the Corps:

> Structural flood control measures have clearly altered and continue to impact the physical, chemical and biological integrity of the lower Missouri River. The far reaching effects of levees on the Lower Missouri River are commented on here because the Corps of Engineers has failed to consider the meaning of cumulative impacts.

Upstream, EPA refused to defer to the Corps' judgment. There is no reason to defer to the Corps' judgment here. EPA is gambling-away this Region's health and safety if it defers to the Corps' assessment and the Levee District's assessment that there is little risk the West Lake Landfill site will be impacted by flood waters. The radiologically-contaminated waste should be removed from the floodplain.

Sincerely,

Bruce A. Morrison

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