

US EPA ARCHIVE DOCUMENT

**West Lake/Bridgeton Landfill Community Advisory Group Executive Committee
Response to Environmental Protection Agency's Proclamations Regarding the
Bridgeton Municipal Athletic Complex**

West Lake/Bridgeton Landfill Community Advisory Group (CAG) Executive Committee notes that the United States Environmental Protection Agency (EPA) Region 7 has not held up its responsibility to protect human health and the environment at the Bridgeton Municipal Athletic Complex (BMAC). EPA region 7 has presented misleading information to the public, failed to follow standards that they themselves implemented for testing of a potentially radiologically impacted site, and ignored sound data. We have examined EPA Region 7 claims and statements and it is the conclusion of this committee that EPA should no longer have a role in testing or remediation at BMAC. We formally request that another federal agency re-examine the BMAC site for radiologically impacted material.

While our CAG is primarily concerned with the West Lake Superfund Site, BMAC shares the same community as West Lake Landfill, and in our role as representatives of the community we must speak to these issues as well as those at the West Lake Landfill. The radioactive materials illegally dumped at the West Lake Landfill in 1973 come from a greater problem in the St. Louis Metropolitan Area. These contaminants were not only created in the St. Louis Area but were improperly handled, leaving radioactive material spread across a wide area running from Downtown St. Louis through North St. Louis County and into St. Charles County. These materials are dangerous, spread throughout the area by mishandling and improper transportation, and new sites are still being tested and remediated. A number of these sites are currently being remediated by the United States Army Corps of Engineers (USACE) working in the area under the Formerly Utilized Sites Remedial Action Program (FUSRAP) at a cost of \$1.7 Billion.

The area around BMAC has changed greatly over the last 72 years. From 1942 to 1973, the majority of the radioactive materials were being transported down St. Charles Rock Road, the primary haul route, not only to West Lake Landfill in 1973 but to and from St. Charles County, where Weldon Spring Uranium Feed Mill Plant was located. With the history of improper transportation used in the transfer of materials to and from Weldon Spring and the known improper transportation used in the transfer of materials to West Lake Landfill, it is not only reasonable to suspect but probable that the area around St. Charles Rock Road is contaminated by these same radioactive materials. While the EPA Region 7 assures the public that radioactive waste along the areas of concern along St. Charles Rock Road are below background levels, the Missouri Department of Natural Resources (MDNR) test they cite as proof states that the waste is in fact are at levels higher than background. (MDNR Standard Level IV Report of Analysis Work Order #05-08095-OR; September 14, 2005)

The CAG Board has found statements and information provided by the EPA Region 7 to be misleading regarding BMAC. Our immediate observation is that the EPA Region 7 made claims of safety prematurely. EPA Region 7 Director Karl Brooks stated, "There is no evidence available to the EPA or DNR that establishes any reason to change the use of

the fields,” (Post-Dispatch; Bridgeton Ball Fields to Remain Open During Radiation Testing; May 9, 2014) In fact, there had been testing that had shown evidence that there were elevated levels of radionuclides. This testing was submitted by the Just Moms STL group. Director Brooks has repeatedly criticized the Just Moms STL testing calling it, “...questionable protocol and analysis” (Post-Dispatch) and during his press conference on May 9, 2014 said that the test by the Moms group was not scientifically legitimate. While attempting to invalidate concerns about BMAC, Dr. Brooks and the EPA have cited 3 tests. None of these tests invalidated the results submitted by the Just Moms STL group.

The first test cited by the EPA is a 2013 MDNR test which is the only test, other than Just Moms STL, which has physically taken samples at BMAC. EPA Region 7 criticized the Moms group testing saying, “the individuals collected the soil from a drainage ditch and not from the ball fields.” (EPA Statement on West Lake Landfill April 30, 2014) This statement is not accurate. The Moms group did take samples from the ball fields and the drainage ditch, and results showed areas of serious concern. MDNR, however, only tested two areas: “pavement” and a “grass island” in the parking lot. (MDNR; Westlake Landfill Radiological Survey; May 16, 2013) This is not the only problem using this test to declare BMAC safe. “The objective of this survey was to collect radiological readings upwind and downwind from the site using odor as an indication of downwind direction.” (MDNR) In other words the test was for contamination of air not soil. That is why MDNR took dust samples instead of soil samples. The MDNR test was never designed or intended to check for radioactive contamination in BMAC soil and it was misleading of the EPA Region 7 to indicate that it was.

The second test which was mentioned by Director Brooks and EPA is a survey of St. Charles Rock Road performed by the MDNR in 2005. (MDNR Standard Level IV Report of Analysis Work Order #05-08095-OR; September 14, 2005) This test clearly shows radioactive contamination well above background but below remediation levels. The testing never sampled inside of BMAC. While this test cannot be used in one way or another to provide a statement about the condition of radioactive contamination at BMAC it nonetheless demonstrates the nearby contamination of St. Charles Rock Road and is misleading to use it as a declaration of safety.

The third test cited by the EPA was performed by FUSRAP under the Department of Energy’s guidance. This is an actual example of testing which is not scientifically legitimate. The truth is there is neither data nor samples to validate this report. When attempting to locate the raw data which was used to construct this report under the Freedom of Information Act the USACE responded, “A diligent search was completed by the Corps personnel and Corps contractor employees and the raw data was not part of the custodial documents...” (letter titled: Response to Freedom of Information Act Request FA-14-0039; June 20, 2014)

The CAG Executive Committee finds the citation of these tests and the declaration of safety before the completion of testing at BMAC purposefully misleading and not in keeping with the EPA’s mission which clearly states’ “all parts of society -- communities,

individuals, businesses, and state, local and tribal governments -- have access to accurate information sufficient to effectively participate in managing human health and environmental risks.” (Our Mission and What We Do; EPA website)

During scrutiny of the EPA’s report entitled PRELIMINARY PRE-CERCLIS SCREENING REPORT BRIDGETON MUNICIPAL ATHLETIC COMPLEX BRIDGETON, MISSOURI, the committee found concern with methods used to perform gamma scans at BMAC. The use of a sodium iodide scintillation detector for a site survey requires several steps to ensure accuracy. The first observation regarding testing is that sodium iodide scintillation detectors for low count rate testing like BMAC can have a, “...reading error of 50%.” (U.S. Environmental Protection Agency; Multi-Agency Radiation Survey and Site Inspection Manual (MARSSIM), Revision 1. EPA 402-R-97-016, Rev. 1. August, 2000) The Multi-Agency Radiation Survey and Site Inspection Manual (MARSSIM) cited by the EPA in their report goes on to tell us that, a sodium iodide detector’s... “energy response is not linear, so it should be calibrated for the energy field it will measure or have calibration factors developed by comparison with a PIC for a specific site. This check should be performed often, possibly several times each day.” Nowhere in the EPA report or attached log books was the mention of ever calibrating the machine to a site specific survey by a PIC (Pressurized Ion Chamber). If proper use of the sodium iodide detector was not done it reduces the 58,716 data points in the EPA report to the accuracy of a coin toss.

The release of a report without all testing completed again has the EPA publically proclaiming the safety of our community at BMAC without all the facts. The report was rushed to public announcement before it had raw data or test results from the soil samples. The soil samples were gathered between May 21st and May 23rd. (PRELIMINARY PRE-CERCLIS SCREENING REPORT BRIDGETON MUNICIPAL ATHLETIC COMPLEX BRIDGETON, MISSOURI; EPA; June 21, 2014) There has been adequate time for an analysis and report from the lab contracted with EPA to be delivered. The EPA was premature in releasing the following statement; “The ball fields remain suitable for use, said Karl Brooks, a regional administrator for the EPA. “All current uses are appropriate at that park,” including the city of Bridgeton’s planned Fourth of July fireworks and celebration, Brooks said.” (EPA: No public health risk from radiation at Bridgeton sports complex; Post-Dispatch; June 26, 2014) The committee feels that the testing and supporting documents provided by EPA Region 7 concerning BMAC should be given great scrutiny before acceptance.

Like the EPA and our elected officials, the CAG was notified by the Just Moms STL group of their independent testing at BMAC and of the lab results these tests generated. The most striking thing about the Just Moms STL group tests are the high levels of Lead-210 found in their samples. The testing was conducted by Eberline Labs in Oakridge Tennessee. Eberline found Lead-210 at 9.1 pCi/g and 10.8 pCi/g in the two samples the Moms group provided. (Standard Level IV Report Analysis Work Order #14-05116-OR; Eberline Analytical/Oak Ridge Laboratory; June 26,2014) Eberline Labs offered the information that the Army Corps of Engineers set a human health limit of 0.846 pCi/g above a background of 1.6 pCi/g during the cleanup of a site near Dayton, OH. (SITE

INSPECTION REPORT DAYTON UNIT III CITY OF DAYTON MONTGOMERY COUNTY, OHIO; USACE; December 2004)

The EPA has plainly stated that they are looking for radium, thorium and uranium, yet they are not looking for Lead-210 at BMAC. The Just Moms STL group notified the EPA of the testing and resulting finding of Lead-210. If EPA was unwilling to accept the Eberline Lab findings FUSRAP has also found a mixture of Radium-226, -228; Thorium-230, -228, -232; Uranium-234, -235, -238; Lead-210; Protactinium-231; and Actinium-227 in the wastes associated with North St. Louis County. (RECORD OF DECISION FOR THE NORTH ST. LOUIS COUNTY SITES; USACE St. Louis District Office; September 2, 2005) A thorough examination of radionuclides in this area would include at a minimum the full list provided by FUSRAP including Lead-210.

Because of the facts stated in this document, the West Lake/Bridgeton Landfill CAG Executive Committee discerns EPA Region 7 to be lacking in its responsibility to protect our community. Director Brooks was dismissive of valid community concerns. With no facts to support a conclusion of community safety Director Brooks publically declared BMAC safe. The testing conducted on behalf of our community by EPA was not satisfactory as it was never designed to look for the areas of concern initially raised by the community. The lack of respect given to the safety of this community by EPA Region 7 obliges the Executive Committee to request another federal agency conduct testing at BMAC. As BMAC is most probably a vicinity property resulting from years of transportation of radioactive materials for United States atomic weapons programs the Committee suggests a study performed by FUSRAP.

MDNR Standard Level IV Report of Analysis Work Order #05-08095-OR; September 14, 2005

http://www.dnr.mo.gov/env/hwp/fedfac/fusrap/docs/2005fusrap_nc_lab_results0508095.pdf

Post-Dispatch; Bridgeton Ball Fields to Remain Open During Radiation Testing; May 9, 2014 http://www.stltoday.com/lifestyles/health-med-fit/health/bridgeton-ball-fields-to-remain-open-during-radiation-testing/article_9742db15-730c-5079-9701-7834466a0e59.html

EPA Statement on West Lake Landfill April 30, 2014

<http://yosemite.epa.gov/opa/admpress.nsf/0/2EC905D19549AC7185257CCA007E9558>

MDNR; Westlake Landfill Radiological Survey; May 16, 2013

<http://www.dnr.mo.gov/env/hwp/fedfac/documents/2013-5-16-westlake-rad-survey-reportl.pdf>

Response to Freedom of Information Act Request FA-14-0039; June 20, 2014 (Attached)

Our Mission and What We Do; EPA website <http://www2.epa.gov/aboutepa/our-mission-and-what-we-do>

PRELIMINARY PRE-CERCLIS SCREENING REPORT BRIDGETON MUNICIPAL ATHLETIC COMPLEX BRIDGETON, MISSOURI; EPA; June 21, 2014
http://epa.gov/region7/cleanup/west_lake_landfill/pdf/bridgeton-municipal-athletic-complex-prelim-report.pdf

U.S. Environmental Protection Agency; Multi-Agency Radiation Survey and Site Inspection Manual (MARSSIM), Revision 1. EPA 402-R-97-016, Rev. 1. August, 2000
<http://pbadupws.nrc.gov/docs/ML0037/ML003761445.pdf>

EPA: No public health risk from radiation at Bridgeton sports complex; Post-Dispatch; June 26, 2014 http://www.stltoday.com/lifestyles/health-med-fit/health/epa-no-public-health-risk-from-radiation-at-bridgeton-sports/article_71c7d19a-339e-5bcc-973a-44386f574fb8.html

Standard Level IV Report Analysis Work Order #14-05116-OR; Eberline Analytical/Oak Ridge Laboratory; June 26,2014 (Attached)

SITE INSPECTION REPORT DAYTON UNIT III CITY OF DAYTON MONTGOMERY COUNTY, OHIO; USACE; December 2004
<http://www.lrb.usace.army.mil/Portals/45/docs/FUSRAP/DaytonIII/day3-si-2004-12.pdf>

RECORD OF DECISION FOR THE NORTH ST. LOUIS COUNTY SITES; USACE St. Louis District Office; September 2, 2005
http://www.mvs.usace.army.mil/Portals/54/docs/fusrap/docs/Final_ROD_linked.pdf