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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7

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ADMINISTRATOR

JUN 01 2015

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Dr. Lois Gibbs  
Center for Health, Environment & Justice  
P.O. Box 6806  
Falls Church, Virginia 22040

Dear Dr. Gibbs:

Thank you for your calls on March 27 and April 9 regarding the West Lake Landfill Superfund site (Site). I appreciated the opportunity to introduce myself to you on the March 27<sup>th</sup> call in my new role as the U.S. Environmental Protection Agency Region 7's Acting Regional Administrator. I especially appreciated the chance to meet some of you face to face recently in Washington DC. As I said during the calls and meeting, I am committed to carrying out the EPA's responsibility to protect human health and appropriately address hazardous substances, pollutants, and contaminants at the Site under all of our federal environmental laws, including the Comprehensive Environmental Response, Compensation, and Liability Act.

With this letter I am responding to the questions you raised during those calls and in your March 30, 2015, letter. Missouri Department of Natural Resources is the federally approved regulator for solid waste landfills. The Bridgeton Landfill (former active sanitary landfill) is being addressed pursuant to the requirements of the state's existing closure and post-closure permit and state enforcement orders. While the EPA retained CERCLA response authority if necessary in the 2008 Operable Unit 2 Record of Decision, we are working closely with the MDNR to ensure protectiveness of human health and the environment.

In your March 30 letter, you request the EPA relocate nearby residents due to the sulfur dioxide (SO<sub>2</sub>) emissions from the flares located on the Bridgeton Landfill. The Missouri Department of Health and Senior Services analyzes ambient air monitoring data for the Bridgeton Landfill collected by the MDNR, and to date the state reports summarizing this analysis do not indicate that there is a potentially unacceptable risk to human health that would warrant relocation. The data from volatile organic compounds (VOCs), hydrogen sulfide (H<sub>2</sub>S), carbon monoxide (CO), benzene and gamma radiation

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monitoring are posted daily by the MDNR. We are continuing to work closely with the MDNR on monitoring plans to address potential human health concerns, as well as any needs for future air permitting actions to ensure the SO<sub>2</sub> National Ambient Air Quality Standards requirements are met. It is the EPA's priority to ensure that the right steps are taken to adequately monitor and address any release or threat of release of hazardous substances, pollutants, or contaminants from the Site.


We continue to evaluate all air emission data and other Site-related information, with the goal to ensure that all appropriate response actions are considered and implemented consistent with CERCLA, the National Contingency Plan, and the EPA Superfund program guidance across the entire Site. The EPA's relocation authority under the National Contingency Plan includes: "temporary or permanent relocation of residents, businesses, and community facilities may be provided where it is determined necessary to protect human health and the environment" (Title 40 of the Code of Federal Regulations (40 C.F.R.) section 300, App. D(g)). Based on the information we have at this time, the EPA has determined that circumstances at the West Lake Landfill Superfund site do not currently warrant the use of permanent relocation pursuant to CERCLA authority.

Just as a matter of clarification regarding the EPA's decision to conduct a supplemental feasibility study for OU-1, that decision was not based upon the presence of the subsurface smoldering event at the Bridgeton Landfill as suggested in your March 30 letter. Rather our decision was in response to concerns raised by the community and others regarding the EPA's 2008 decision to cap the Site and leave radiologically impacted materials in place. As a result, we have chosen to more thoroughly explore other potential alternate remedies, including full and partial excavation.

Finally, during the calls and in our meeting there were references to illnesses and symptoms believed by the community to be related to emissions from the landfill. I appreciate your sharing these concerns with the EPA. I also encourage you and others to continue to report specific individual health concerns to your primary care providers.

I can assure you that we at the EPA take very seriously our responsibility to protect human health using the best scientific data available, consistent with our authorities under federal environmental laws. We appreciate hearing from the community about issues related to the site that are important for the EPA to consider. I look forward to continued engagement with the community.

Sincerely,



Mark Hague  
Acting Regional Administrator