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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7

11201 Renner Boulevard  
Lenexa, Kansas 66219

MAY 05 2015

Mr. Paul V. Rosasco  
Project Coordinator  
Engineering Management Support, Inc.  
7220 West Jefferson Avenue, Suite 406  
Lakewood, Colorado 80235

Dear Mr. Rosasco:

The U.S. Environmental Protection Agency has reviewed the May 1, 2015 submittal titled "Phase 1D Investigation – Additional Characterization of Extent of Radiologically-Impacted Material in Area 1: Revised Addendum to Phase 1 Work Plan for Isolation Barrier Investigation, West Lake Landfill Operable Unit-1, Bridgeton, Missouri" (Work Plan Addendum) prepared by Engineering Management Support, Inc. on behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC., Rock Road Industries, Inc. and the United States Department of Energy. The document was originally submitted in response to the EPA's January 15, 2015 letter to the West Lake Landfill Superfund Site potentially responsible parties (PRPs) and in accordance with the Administrative Order on Consent, EPA Docket No. VII-93-F-0005. It has since been revised twice (April 20, 2015 and current submittal) by the responsible parties and resubmitted in response to three sets of EPA reviewer comments that were submitted on March 5, 2015; April 3, 2015 and April 24, 2015. It has also been revised in accordance with comments submitted by the Missouri Department of Natural Resources (MDNR) and Saint Louis County Health Department, dated April 10, 2015 and April 6, 2015; respectively; and additional comments submitted by email from MDNR dated April 30, 2015.

Based on our review and in the interest of initiating field work as soon as possible, EPA approves the revised Work Plan Addendum, dated May 1, 2015, with additional comments enclosed. EPA does not expect the parties to submit a revised Work Plan Addendum. The responsible parties are thereby approved to proceed with the additional characterization efforts as outlined in the addendum and fieldwork tentatively scheduled to start May 11, 2015.

EPA appreciates the responsible parties' cooperation in this matter. If you have any questions regarding this letter or need further clarification on our comments, please email or contact me at (913) 551-7611.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Vann".

Brad Vann  
Remedial Project Manager  
Missouri/Kansas Remedial Branch  
Superfund Division

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Enclosure

cc: Shawn Muenks, MDNR  
Joe Benco, Republic

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**Comments for the May 1, 2015 “Phase 1D Investigation – Additional Characterization of Extent of Radiologically-Impacted Material in Area 1: Revised Addendum to Phase 1 Work Plan for Isolation Barrier Investigation, West Lake Landfill Operable Unit-1, Bridgeton, Missouri” (Work Plan Addendum)**

**1. General Comment – The EPA concurs with the additional work defined in this Work Plan Addendum and provided to EPA in response to the technical discussion held on January 23, 2015. EPA emphasizes that this Work Plan Addendum includes the requirement for the parties to perform additional sampling beyond the identified 14 locations necessary to fully define the nature and extent of RIM, as that term is defined in the Bridgeton Landfill – West Lake Landfill Core Sampling (Phase 1B, 1C, and 2) Work Plan, Revision 1 (January 8, 2014).**

**2. Response to Comment on Page 5, Field Investigation and Sample Collection and Analysis, first paragraph, Item 6 - EPA notes that a response to EPA’s comment will be prepared based upon information provided by Cotter. EPA does not consider the substance of this comment sufficient at this point to warrant delay of the tentatively scheduled fieldwork. EPA does however require and expects a response to be provided by the Respondents.**

**3. Pages 5, Field Investigation and Sample Collection and Analyses, Item #6, last sentence of second paragraph – The sentence states “For Sonic borings that are drilled outside of the extent of the 1971-1975 waste deposit, and whose core samples do not display any identifiable elevated gamma levels, laboratory samples will be collected from two random depth intervals.” EPA recommends where there is no elevated gamma readings and where applicable, it would be prudent to obtain at least one sample at a depth that would generally correspond to the 1971-1975 waste elevations instead of randomly.**

**4. Pages 7-8, Reporting – EPA’s expectation that the Phase 1D investigation report and Comprehensive Interpretive report will be submitted to EPA for review and approval as described in the Administrative Order on Consent, EPA Docket No. VII-93-F-0005. In addition, EPA expects the methodology for selection of all sample locations, including the rationale for selection of the initial 14 sampling location as discussed in the January technical meeting, be included in the Phase 1D investigation report.**

**5. Figures (new) Proposed Phase 1D Borings in Area 1 (1971 and 1975 Aerials) – The revised figures 1 and 2 that show the Phase 1D boring locations with overlay on the 1971 and 1975 aerial photographs, topographic layer, as provided in EMSI’s 5/1/15 email response to MDNR comments, are approved and needs to be included within the Phase 1D data report upon submittal and updated if additional sampling points are added during fieldwork mobilization.**