Center for Health, Environment & Justice
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November 21, 2014

Karl Brooks
Regional Administrator
USEPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Brooks:

Thank you for responding to my letter. I'm still confused by your response, especially your comments around risks.

My understanding is that EPA has previously stated that they cannot do a risk assessment around the unknown risks of the out-of-control fire intercepting with radioactive wastes. I think the term used by your staff was that it was "scientifically impossible." EPA's March 28, 2014 memo said, "Since we do not have a full accounting of the material in OU-1, we cannot make a definitive assessment regarding the potential for chemical reactions between the RIM and non-RIM materials if an SSE were to occur[4]. If these reactions were to occur, they could cause a rapid buildup of heat or gas, and subsequent reactions or reactive conditions in the landfill. An SSE may allow radon gas to more easily rise through the ground and reach the surface of the landfill than would otherwise occur." Because you cannot conduct a risk assessment DOES NOT mean there are no significant health risks. In fact, it further supports the need to relocate families living around the site.

Moreover, families are already being exposed to VOC's and other contaminants in the air from the fire. So far, each finding has been assessed for acute exposure risks when the reality is that these findings should be assessed for chronic exposure risks because they are happening often if not on a daily basis.

The Missouri Department of Natural Resources (DNR) disagrees with the conclusions reached by the EPA regarding the movement of the smoldering landfill fire, or the "SSE". DNR's landfill fire consultant, Todd Thalhamer, authored a memo in June[1] and again in August[2] stating the smoldering landfill fire is at or beyond the Gas Interceptor Wells (GIWs), the devices meant to keep the smoldering landfill fire from moving north toward the radioactive wastes. Further, the DNR's evaluation of recent data "reveals a continuing upward trend in temperature in the neck area of the Bridgeton Landfill[3], which prompted the DNR to require further action at the landfill to monitor the movement of the smoldering fire.

In closing I would like to know how you made your decision about risk when your own agency has stated on multiple occasions that they are not scientifically able to define the risks. Republic Services is a viable corporation that has the resources to reimburse the EPA for costs associated with relocation. After EPA and Republic Services clean up the two sites they can consider reselling the residential properties to new families, assuming the area is safe.

I look forward to your response.

Sincerely

Lois Marie Gibbs
Executive Director

Thalhamer June Memo
[2] Thalhamer August Memo
[3] DNR Letter to Republic Services, October 7, 2014:
http://www.dnr.mo.gov/bridgeton/docs/bridgetontmpcorrectiveactionassessmnt100714.pdf

[4] http://www.epa.gov/region7/cleanup/west_lake_landfill/pdf/west-lake-etsc-observationsonemsireport.pdf