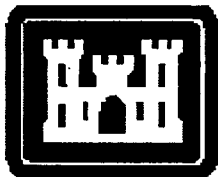




**ADMINISTRATIVE RECORD
FOR THE MADISON SITE
MADISON, ILLINOIS**

**Remedial Investigation Documentation and
Feasibility Study-**

**IEPA Comments on the Draft Remedial Investigation,
Feasibility Study and Proposed Plan for the Madison
Site**



**US Army Corps
of Engineers
St. Louis District**



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/785-7728
(FAX)782-3258

January 10, 2000

Department of the Army
St. Louis District, Corps of Engineers
Attn: Ms. Sharon Cotner
9170 Latty Avenue
Hazelwood, MO 63134

Re: Draft Remedial Investigation, Feasibility Study,
and Proposed for the Madison, IL FUSRAP Site

1190655059 -- Madison Co.
Madison FUSRAP/Madison
Superfund/Technical File

Dear Ms. Cotner:

The Illinois Environmental Protection Agency ("Illinois EPA") received the document referenced above on December 13, 1999. The document addresses residual radiological contamination known to exist at a Formerly Utilized Sites Remedial Action Program ("FUSRAP") site located in Madison, Illinois. During the late 1950s and early 1960s the Dow Chemical Corporation, under contract with Mallinckrodt Chemical Company, conducted uranium metal extrusion research and development and uranium rod straightening at the Madison FUSRAP Site for the U.S. Atomic Energy Commission ("AEC").

The subject document describes investigations (radiologic surveys and RI) to determine the extent of AEC related residual uranium dust contamination on interior surfaces of the Madison FUSRAP Site facility, now operated by Spectrulite Consortium, Inc. A feasibility study is included which evaluates several remedial alternatives for cleaning up the interior contamination of the Madison facility. The preferred alternative, Decontamination of Accessible Surfaces and Release of Building (Alternative 4), is described in the Proposed Plan.

Illinois EPA reviewed the subject document, but found no discussion or evaluation of contamination other than the uranium dust. Please be advised that without any investigation of past materials handling practices for industrial wastes associated with AEC activities (e.g., the generation and management of CERCLA hazardous, RCRA hazardous or mixed waste (die lubricants and solvents mixed with residual uranium)), the Illinois EPA does not have any regulatory standing by which it could provide comment. AEC related waste handling practices

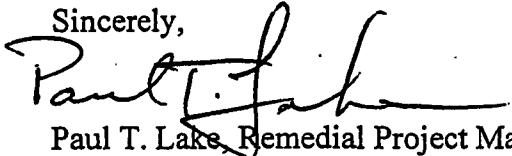
Ms. Sharon Cotner
January 10, 2000
Page 2

1190655059 -- Madison County
Madison FUSRAP Site
Superfund/Technical File

should be identified by USACE, incorporated into this document, and communicated to Illinois EPA. The Illinois EPA defers the evaluation of Applicable or Relevant and Appropriate Requirements ("ARARs") and determinations regarding the adequacy of the investigation and proposed remedial actions for uranium dust in the Madison FUSRAP facility to the Illinois Department of Nuclear Safety, the State of Illinois agency responsible for regulating radiologic contamination.

In no way should this letter be construed as a release of liability pursuant to Section 4(y) of the Illinois Environmental Protection Act or CERCLA for contamination that may have resulted from U.S. Government activities at the Madison FUSRAP Site. Should you have any questions regarding this letter, please do not hesitate to contact me at the number above.

Sincerely,



Paul T. Lake, Remedial Project Manager
Federal Facilities Unit
Federal Sites Remediation Section
Bureau of Land

PTL:^{SDN}h:\fusrap\madison.com

cc: Gary McCandless, IDNS