

21-17328-01

30-12572

May 5, 1981

Mr. David Graham
 Deputy General Counsel
 Velsicol Chemical Corporation
 341 East Ohio Street
 Chicago, Ill 60611



Dear Mr. Graham,

This letter is to confirm the telephone conversation of May 1, 1981 between Mr. M. C. Schumacher of this office and Mr. Neal Netzel of Velsicol wherein permission was given to begin decommissioning work in specific areas of the St. Louis, Michigan plant site. The work is to be done in accordance with your previously submitted Survey-Decontamination Plan. The areas are, with one exception, those designated A, B1, and B2 in the submittals made to us by your contractors at the March 6, 1981 and April 9, 1981 meetings at Region III and referred to in your letter dated April 9, 1981. A exception is that Building 516 will remain in Area C rather than B2 as shown in your submittals and will not be part of the work phase considered here. This reflects an agreement from the April 9 meeting.

Permission to begin this work is based on our review of the survey data of your contractors and on independent measurements of direct radiation and contamination made by representatives of this office during an inspection April 20-24, 1981. These measurements are in general agreement with yours and indicate levels within the normal background range. An exception is apparent ground contamination on the edge of Area A near the railroad tracks south of Buildings 540, 501 and 502. As stipulated in the May 1st telephone conversation, permission for Area A work is given only with the understanding that this contamination would first be removed to prevent possible spreading by personnel and/or vehicle movement.

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We also emphasize that approval is currently limited to the designated areas. This work in other areas such as the dismantling of the calcium chloride warehouse observed by our inspection on April 23, 1981 is not approved. Previous discussions between Dr. C. J. Paperiello of this office and you granting approval to remove sheds was limited to small buildings within Area A which were to be surveyed in the same manner as equipment transferred off-site.

If your understanding of this matter differs from ours, please contact us immediately.

Sincerely,

J. A. Hind, Acting Director
Division of Emergency Preparedness
and Operational Support

cc:

T. O'Mara, USEPA, RV

S. Sylvester, MI Department
of Natural Resources

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