



Mr. Scott D. Cornelius
Project Manager
Superfund Section – Environmental Response Division
Michigan Department of Environmental Quality
Knapps Centre
P.O. Box 30426
Lansing, MI 48909-7926

SUBJECT: Superfund Redevelopment Initiative Pilot Project for Velsicol Superfund Site

3 July 2003

Dear Scott:

I am writing to follow up on our July 1st discussion of the reuse planning process for the Velsicol Chemical Corp. Superfund site in St. Louis, Michigan. I was encouraged to learn that after we shared our thoughts regarding process and substance, we are all on the same page with regard to the project's timing and scope.

With regard to timing, E² Inc. will be working with the City of St. Louis, community residents, US EPA, and MDEQ to conduct a community-based reuse planning process during the site's ongoing Remedial Investigation and Feasibility Study (RI/FS). The site's RI/FS provides the best opportunity to ensure that the community's long-term considerations and priorities for the site are taken into account during the design of the site's remedy. Experience shows that a failure to thoroughly consider a site's reuse prior to selecting a remedy can needlessly preclude appropriate future uses at an NPL site. US EPA is also required to consider a site's reasonably anticipated future land uses, under OSWER Directive No. 9355.7-04 – the Superfund Land Use Directive – and OSWER 9355.7-06P – the Agency's Reuse Assessment Guidance.

In terms of the project's scope, the reuse planning process is focused on helping the community develop a set of future land use recommendations that can help inform US EPA and MDEQ's remedy selection for the Velsicol site. As we discussed, we are also acutely aware of the need to support a realistic dialogue with the community regarding reuse possibilities at the site. While it is not our place to in any way drive the process toward a particular outcome, it is an important component of our mission to help the community to understand the opportunities as well as the limitations on reuse associated with the realities of the site. The reuse planning process for the

E² Inc.
2417 Northfield Road
Charlottesville, Virginia 22901
Ph. 434.975.6700 - Fx. 434.975.6701



Velsicol site is an opportunity for the community to learn about the site and consider the site's reuse within a larger context. The process will be informed by available information on the site's contamination and current remedial status, as well as information on other economic, legal, and physical conditions that impact the site's reuse. As a result, Committee discussions will be grounded in site-specific considerations from the outset.

The City and the community will also consider current and future site ownership issues, including potential land transfer options, as part of the planning process. It is unreasonable to expect that the City or any other entity would take title to the property without first considering the property's reuse potential and the implications of ownership. As concerns related to ownership issues arise during the process, we are prepared to offer the benefit of our experience with such matters to the parties involved.

As this project moves forward, the community and the project's consultant team will be most effective if they have the support of both US EPA and MDEQ. I look forward to the results of the project's first Committee meeting, scheduled for July 9th in City Council Chambers in St. Louis. If you have any questions or insights along the way that you would like to share with me, please feel free to contact me directly so that I may ensure that our involvement with the site provides the community, US EPA, and MDEQ with the greatest benefit possible.

Sincerely,

David Slutzky
President
E² Inc.

cc: Dennis Collison, City of St. Louis
Mari Anne Layman, City of St. Louis
John Harris, National Program Coordinator for Superfund Redevelopment
Thomas Bloom, US EPA Region V
Stephanie Ball, US EPA Region V
Stuart Hill, US EPA Region V
Murray Borrello, Pine River Superfund Task Force
Jane Keon, Pine River Superfund Task Force