GWOU ADMINISTRATIVE RECORD
SECTION TITLE:
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MISSOURI DEPARTMENT OF NATURAL RESOURCES

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- ☐ URGENT
- ☐ Priority
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- ☐ As Requested
- ☐ FYI

To: David Geiser
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From: Bob Geller
FAX # (573) 526-5268
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SUBJECT: Weldon Spring site

COMMENTS: Attached is a copy of the letter and comments regarding DOE's Proposed Plan for the Groundwater Operable Unit. I will also provide electronic copies via e-mail today. We look forward to continuing our discussions with you and EPA to resolve the outstanding issues.

RESPONSE EXPECTED: none

Total # of pages sent (including transmittal sheet): 18

If problems with FAX call: (573) 751-3907

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Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

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September 3, 2003

Mr. David Geiser
U.S. Department of Energy
Office of Long Term Stewardship, EM-51
1000 Independence Ave., SW
Washington, D.C. 20585

RE: PROPOSED PLAN FOR FINAL REMEDIAL ACTION FOR THE GROUNDWATER OPERABLE UNIT AT THE CHEMICAL PLANT AREA OF THE WELDON SPRING SITE, WELDON SPRING, MISSOURI (August 2003)

and

SUPPORTING EVALUATION FOR THE PROPOSED PLAN FOR FINAL REMEDIAL ACTION FOR THE GROUNDWATER OPERABLE UNIT AT THE CHEMICAL PLANT AREA OF THE WELDON SPRING SITE, WELDON SPRING, MISSOURI (August 2003)

Dear Mr. Geiser:

The Missouri Department of Natural Resources received the Groundwater Operable Unit (GWOU) Proposed Plan and Supporting Evaluation on August 4, 2003, for review, comment, and possible concurrence. We appreciate the opportunity to comment and participate in this review process. As you know, the state of Missouri has noted we can support the Department of Energy's (DOE) proposal of "monitored natural attenuation" – (leaving contaminated ground water in place) but only if some important technical and institutional conditions have been defined. Regrettably, even after continued coordination between this department and yours, the Department of Natural Resources can not concur with the proposed remedial action as presented in this Proposed Plan because it does not provide adequate protection for Missourians. Too many important details remain absent from this plan for our department to provide concurrence at this time. To reiterate this department's concerns, I have enclosed a copy of our comments for

you to address before continuing with the GWOU Record of Decision. I would like to personally bring to your attention several very important issues this department continues to have with the DOE's Proposed Plan.

Monitoring System
DOE has stated; due to the complex hydrological conditions at this site, conventional and currently available innovative techniques are ineffective in remediating groundwater. Complexities included a groundwater divide, karst conduit systems, and paleochannels. These features resulted in a highly complex aquifer with heterogeneous and anisotropic characteristics. The department agrees that these characteristics make conventional treatment difficult at this site. The department also believes these characteristics make the need for a detailed monitoring system, including vertical monitoring with conservative trigger levels, even more important so the MNA alternative can be protective of human health and the environment. The Proposed Plan does not contain this sort of monitoring system or trigger levels. The department believes if appropriate trigger levels are not set prior to finalizing the GWOU Record of Decision, the department must have the ability to legally concur with the Remedial Design/Remedial Action report, that defines these details. Since contamination levels at Burgermeister Spring fluctuate significantly, a conservative, protective plan should also include regular fish tissue sampling and passive treatment of contaminated groundwater currently discharging at Burgermeister Spring.

Federal Facilities Agreement
The department continues to insist that we become a full partner to an appropriately updated Federal Facilities Agreement (FFA). The Environmental Protection Agency, DOE, and this department have all agreed to this in concept. I recommend we use the latest model FFA to develop a document that all the parties can review, comment on, and agree to, concurrent with development of the plan to address the groundwater. The revised FFA document must be in place before or concurrent with execution of the GWOU ROD. This process is consistent with assurances offered by DOE that the state would become a signatory with enforcement authority at the signing of the final site ROD. This approach helps ensure that this department will be able to represent the public's future concerns.

Long-Term Stewardship
As this is the final ROD for this site, the actions or inaction now in proposing how to address contaminated groundwater existing on or emanating from this site, are critical and will continue to be for future generations. It is vital that the plan includes the establishment of the necessary institutional controls to inform future owners and users of the property adjacent to the cell, as well as impacted neighbors such as the Missouri Department of Conservation, so as to minimize exposure of those same individuals to residual radioactive or hazardous wastes. Such a decision is one we do not take lightly. In the rapidly growing county of St. Charles, where this site is located, useable land and water resources remain at a premium. We anticipate continued growth

and pressure for "clean" and "safe" areas to live, work and/or visit for recreation. We must ensure that our decisions today are fully protective for the future.

The GWOU ROD must have the Stewardship Plan incorporated as a major component since the protectiveness of the remedy is reliant on long-term stewardship, long-term monitoring, and long-term maintenance. Adequate long-term stewardship must include provisions for secure, long-term funding for maintenance, monitoring and continued state oversight along with clear enforcement authority.

As stated previously, this department remains concerned about the DOE's Proposed Plan for addressing groundwater. We must be confident that the plan for long term monitoring of the contaminated groundwater will produce the necessary data to prove to ourselves and the public that contamination is truly attenuating, and contaminant migration is not creating unacceptable risks to the people who live, work, and play near the site. DOE is obligated to achieve this same goal.

I have compiled a set of detailed comments that should be addressed before the GWOU ROD. If you have any questions about the basis, meaning or intent of any of the comments do not hesitate to call me at (573) 368-2100, or Robert Geller at (573) 751-3907, immediately. Written inquiries may be directed to me at P.O. Box 250, Rolla, MO 65401, or to Mr. Geller at the Hazardous Waste Program, P. O. Box 176, Jefferson City, MO. 65102-0176. We look forward to working with you to create an adequate plan for addressing the groundwater contamination at the Chemical Plant Site that everyone can support with confidence.

Thank you for your attention to this critical matter.

Sincerely,

GEOLOGICAL SURVEY AND RESOURCE ASSESSMENT DIVISION

Mimi R. Garstang, RG
Director and State Geologist
Director's Office - Administration Program
573/368-2101
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MG:led

Enclosure

c: Mr. James Gulliford, U.S. Environmental Protection Agency-Region VII
Ms. Pam Thompson, WSSRAP Project Office
Mr. Dan Wall, U.S. Environmental Protection Agency-Region VII
Weldon Spring Citizens Commission

Comments

Proposed Plan for Final Remedial Action for the Groundwater Operable Unit at the Chemical Plant Area of the Weldon Spring Site, Weldon Spring, Missouri, August 2003

General Comments:

Institutional controls are an integral component of the proposed remedy. The department will not consider the remedy complete or protective until all components of the remedy are in place, including institutional controls.

While not directly related to comments on the plan, the issue of having the state as a co-signatory to the revised Federal Facility Agreement is vital to assurance of regulatory enforcement of the ROD and stewardship plan. This will also allow the department to represent future public concerns.

The Department of Health and Senior Services is committed to regular, offsite, private, drinking water well monitoring. As discussion progresses on the LTS plan the Department of Natural Resources will support the need for funding to continue this sampling near the WSSRAP. The MDNR and DHSS believe the DOE must develop a mechanism for funding of private well sampling in to the future to ensure this commitment is maintained.

The department believes the GWOU ROD must commit to a fully executed FFA that includes the state before the LTS plan is finalized.

The department believes the GWOU ROD must identify the State of Missouri as having approval authority over the remedial design (RD/RA).

The Departments of Conservation, Health and Senior Services, and Natural Resources agree that fish sampling should be conducted on a regular basis to verify conditions are protective. This will ensure the public is well informed about the conditions of fish in the area.

Enclosed are comments prepared by the Missouri Department of Conservation. These comments are submitted and should be addressed in the responsive summary.

The Department of Transportation and this department believe that signs should be erected near the two culverts under Highway 94 and State Road D. These signs would inform the potential construction worker of the need to call the DOE for further information. This comment can be addressed in the LTM plan.

Detailed Comments:

Comment 1) Page 3, The plan states 1,3,5-TNB is a contaminant of concern (COC). Page 10 of the plan lists the ARARs and RBCs. Previous versions of this plan have included a RBC for 1,3,5-TNB. This plan fails to include a RBC for the COC 1,3,5-TNB. Please explain this omission.

Comment 2) Page 4, Uranium section, The plan states, "Contamination is primarily limited to the weathered portion of the shallow aquifer." The document continues by naming the two wells currently contaminated, MW-3024 and MW-3030. The monitoring well with the highest concentration of uranium is MW-3024, which is depicted on figures 2 and A.3 as a well monitoring the unweathered portion of the aquifer. This suggests that the uranium contamination is predominantly in the unweathered portion of the Burlington-Keokuk Limestone.

Comment 3) Page 5, last paragraph, The plan states "Water discharged at Burgermeister Spring then mixes with other surface water and with ponded water in Lake 34." Either in the plan it is stated that Burgermeister Spring discharge concentrations range from 8.6 to 100 pCi/l. This information leads to the question of what impact has this had on fish in Lake 34? The DOE sampled fish in 1993 but only took fillet samples. The department suggests annual sampling of fish samples to ensure the public is well informed about the conditions of fish in the area.

Comment 4) Page 6, first complete paragraph. The plan states " . . . and no groundwater contamination attributable to the Chemical Plant site is present south of the divide . . .." Although the department understands the purpose of this statement and paragraph, we also find this statement potentially misleading. Currently, contaminated groundwater attributable to the Chemical Plant exists south of the groundwater divide. The contaminated groundwater in the Southeast Drainage is a prime example. The department suggests the information in this paragraph be rewritten to reflect this fact.

Comment 5) Page 8, first part paragraph. The plan states "although the MCL of 5 µg/l was not sustained throughout the plume.". This statement is misleading since the Interim Action was not designed to treat TCE throughout the plume. A more accurate statement would be "although the MCL of 5 µg/l was not sustained in the treatment area." This could be followed by a brief statement explaining why the MCL was not sustained.

Comment 6) Page 9, Figure 2.4 Uranium Contamination Contour for 2002 at the Chemical Plant Area. There are no unweathered wells located east or southeast of the uranium plumes illustrated in this figure. It also appears that the plume drawn around MW-3024 incorporates data from weathered zone wells with data from MW-3024, an unweathered zone well. The justification of this is not clear, particularly in light of the fact that the two zones exhibit different characteristics: e.g., the weathered zone well, MW-3025, adjacent to MW-3024 has a higher water level and lower uranium concentration than MW-3024. Additional unweathered wells are required in these locations to further characterize the horizontal and vertical extent of uranium contamination.

Comment 7) Page 11, first complete paragraph. The plan states "These ICs would be indefinite-term licenses, easements, or permits, as applicable." The State of Missouri recommends the DOE include the State Registry in this list of ICs. As part of the ICs available, DOE can volunteer to be included on the registry or the department can place areas of this site on the registry.

Comment 8) Page 15, first complete paragraph. Contingencies are defined in this paragraph. The DOE has previously committed to conducting fish sampling as a contingency if uranium concentrations at Burgermeister Spring reach the historical highs that occurred during the timeframe of the bio-0uptake sampling efforts. This contingency should be added to this paragraph. Generic language would be appropriate.

Comment 9) Page 15, second column, first part paragraph. The plan states "Active treatment alternatives have been investigated and determined to be ineffective." This statement is not factual. Active treatment of TCE was proven to be effective at the pilot scale. Localized treatment of TCE is effective. The department suggests rewording this sentence to include localized treatment of TCE is effective and hot spot treatment is predicted to be effective.

Comment 10) Page 15, second complete paragraph. The department does not agree with the design as detailed in the referenced supporting evaluation report. Please refer to the detailed comments on the supporting evaluation report.

Comment 11) Appendix A, This version of the plan does not contain a contaminant contour map for the COC 1,3,5-TNB. Please explain this omission.

Comments
8/27/2003
Supporting Evaluation for the Proposed Plan for Final Remedial Action for the Groundwater Operable Unit at the Chemical Plan Area of the Weldon Spring Site, Weldon Spring, Missouri

General Comments:

Several of the plan's proposed action levels and the number and location of monitoring locations are unacceptable. Since the shallow groundwater system is hydrogeologically complex, additional monitoring wells beyond those proposed will be needed to provide a comprehensive and acceptable monitoring system. More conservative trigger levels are needed in several instances to provide a factor of safety in this complex hydrogeological environment to be fully protective on human health and the environment.

Detailed Comments:

Comment 1) Section 2.1.1 Groundwater, page 5. The contaminants of concern listed in the first paragraph do not match the COCs listed in the proposed plan. The nitroaromatic compound 1,3,5-trinitrobenzene (1,3,5-TNB) is listed as a COC in the proposed plan but has been omitted in the supporting evaluation. Please explain this discrepancy and omission.

Comment 2) Figures 2.1 through 2.8, This version of the evaluation does not contain a contaminant contour map for the COC 1,3,5-TNB. Please explain this omission.

Comment 3) Page 5, Section 2.1.1 Groundwater, The document refers to figures 2.2 through 2.7 to depict locations exceeding water quality standards or risk-based concentrations (RBCs). These figures only depict the horizontal extent of contamination. Please include maps representing the three dimensional extent of contamination. From our understanding, DOE has had the information to produce these maps since the Remedial Investigation, except for the TCE. Additional monitoring will be needed to define TCE vertical extent. In addition, citizens at the PP public meeting requested these three dimensional maps.

Comment 4) Page 13, fourth paragraph. The document states "Uranium contamination occurs predominantly on the Chemical Plan site in the weathered unit of the Burlington-Keokuk Limestone." The document continues by naming the two wells currently contaminated, MW-3024 and MW-3030. The monitoring well with the highest concentration of uranium is MW-3024 which is depicted on figures 2.1 and 2.4 as a well constructed in the unweathered portion of the aquifer. This suggests that uranium contamination is predominantly in the unweathered unit of the Burlington-Keokuk Limestone.

Comment 5) Page 14, Section 2.1.2 Spring Water, The last sentence of this section states that, "Nitrate and TCE were not detected in this spring." According to the records provide to this department by the DOE, nitrate was detected in SP-5304 during 2002. These detections were below the MCL of 10 μg/L

Comment 6) The document states "Water discharged at Burgermeister Spring then mixes with other surface water and with ponded water in Lake 34." Elsewhere in the plan it is stated that Burgermeister Spring discharges uranium concentrations that range from 8.6 to 100 pCi/l. This information brings into question what impact this has had on fish in Lake 34. The DOE sampled fish in 1993 but only analyzed fillet samples. The department suggests annual analysis of whole fish samples to ensure that the public is well informed about the conditions of fish in the stream receiving impacted groundwater from the site.

Comment 7) Pages 15-17, last paragraph on page 15. Page 15, Section 2.2.1 Geology and Hydrogeology, last complete paragraph, The statement that "no groundwater contamination attributable to the Chemical Plant site is present south of the divide therefore there is no groundwater component to the contamination present in the downgradient springs" is not supported by 2002 sampling results from SP-5304. Uranium sampling data from SP-5304 in 2002 ranged from between 9.4 and 103 pCi/l (Section 2.1.2 Spring Water). Also in 2002 there were detections of 2,4,6-trinitrotoluene (2,4,6-TNT) in SP-5304. Another statement in the same paragraph ("springs in the Southeast Drainage act as end points of *direct* (emphasis added) groundwater transport for the Chemical Plant Area and provide ideal locations for monitoring groundwater contamination") contradicts the preceding quote. The department suggests the information in this paragraph be rewritten to reflect this fact.

Comment 8) Section 3.1.2 Results of the Field Studies, paragraph three, page 30. The last sentence of this paragraph has been significantly revised since the March 2003 draft Proposed Plan. For example, in the draft document it is stated that extracting water from the more transmissive portions of the shallow aquifer would effectively remediate the groundwater in this area. In the August 2003 revision of the Proposed Plan the term "effectively remediate" has been changed to "remove" and "this area" has been changed to "a small discrete area". Actually, the capture area illustrated by the DOE during the additional field study was quite large. We suggest future explanations of the field study be more factual.

Comment 9) Page 38, last paragraph, The document states "It was envisioned in the IROD that two sets of wells and two injections would achieve the MCL." The department disagrees with this interpretation of the IROD. The IROD states "the need for the installation of approximately two sets of nested application or injection wells, with multiple rounds (at least two) of chemical reagent application." The terms "two sets of nested application or injection wells" referred to two rows of several injection wells that may have included many more wells than just two. Also the IROD refers to multiple rounds of chemical application. Two rounds were considered a minimum.

Comment 10) Page 49, Section 3.5.2 Evaluation of ICs for Application at the Chemical Plant Area, Institutional controls are an integral component of the proposed remedy. The department will not consider the remedy complete or protective until all components of the remedy are in place, including institutional controls.

Comment 11) Page 49, Section 3.5.2 Evaluation of ICs for Application at the Chemical Plant Area, The State of Missouri recommends the DOE include the State Registry as a viable ICs. As part of the ICs available, DOE can volunteer to be included on the registry or the

department can place areas of this site on the registry. This would be considered as an added layer to the ICs that would be implemented.

Comment 12) Page 57, Section 4.3.1 Description, third paragraph, The last sentence contains a typographical error. Section 3.1.2.1 does not exist.

Comment 13) Page 65, Section 5.2 PROPOSED PERFORMANCE MONITORING STRATEGY, last paragraph, The document states "For uranium, the contingencies include additional fish sampling at Lake 34.". This statement is not reflected in Table 5.3 as a contingency.

Comment 14) Page 67, Table 5.1, According to the table, a previously proposed unweathered-zone well, UW-2 (to be located near MW-3034) was deleted from this monitoring plan. The identified unweathered-zone well, UW-1 (originally to be located near existing well MW-4031) has now, according to this table, been relocated to the MW-4037 area in the leading edge of the TCE plume. Without these wells in the highest TCE concentration areas, a remedial objective of MNA, to verify that vertical expansion of the TCE plume is not occurring, cannot be accomplished. The previous agreement of the technical review team was to install two new unweathered monitoring wells, one adjacent to MW-4031 and one next to MW-3034. These new wells are necessary to properly delineate the vertical extent of TCE contamination and will help fulfill Objective A. DOE should take the appropriate precaution during installation to minimize migration caused by improper installation techniques.

Comment 15) Table 5.1, In several places this table states "...if TCE concentrations in the center of the plume have dissipated to <300 µg/L". In all occurrences, the department believes a more appropriate level to be <50 µg/L.

Comment 16) Page 70, The proposed Objective C trigger of 75 µg/l TCE at monitoring well W-1 is unacceptable. This trigger should be 10 µg/l at this location. The In-situ Chemical Oxidation (ICO) hot spot trigger should also be 10 µg/L.

Comment 17) Page 71, The proposed Objective C trigger concentration at MWS-1, 20 µg/l is unacceptably high. A more appropriate trigger concentration for MWS-1 located at the federal property boundary would be a more protective concentration level of 5 µg/l (the MCL).

Comment 18) Page 72, Trigger Concentration or Event Column, The word "well" should be "spring".

Comment 19) Page 75, Table 5.2, No characterization (Objective A) wells are included in this table to confirm the extent of the nitrate plume in the vertical direction. Without these wells beneath the highest nitrate concentration areas, a remedial objective of MNA, to verify that the vertical expansion of the nitrate plume is not occurring, cannot be accomplished. Monitoring wells 3024, 3026, and 4011 are all nitrate contaminated wells screened in the unweathered zone. The department recommends installation of three wells in the unweathered portion at location beneath MW-3024, MW-3026, and MW-4011. These, in

addition to new monitoring wells nested at MW-4031 and MW-3034, will be used to help delineate the nitrate contamination in the unweathered zone. DOE should take the appropriate precaution during installation to minimize migration caused by improper installation techniques.

Comment 20) Page 75, Table 5.2, Trigger Concentration or Event column, b. (1), The proposed trigger concentration of 1,500 mg/l is too high. A more appropriate concentration would be 1,000 mg/l. If the concentration exceeds 1,000 mg/l the probability that MNA standard Objective B is being accomplished would be in doubt.

Comment 21) Page 75, Table 5.2 Preliminary MNA Performance Monitoring for Nitrate, Trigger Concentrations of Event column, b. (2), The proposed trigger of 1,000 mg/l (average of the high three concentrations) in this plan is too high. The MNA timeframes should be recalculated if the average of the high three consecutive concentrations exceeds 600 mg/l.

Comment 22) Page 77, Table 5.2, Two wells, MW-3026 and MW-4011 are listed as wells that monitor the unweathered bedrock unit. These unweathered unit wells show nitrate concentrations ranging from approximately 100 to 200 mg/l. If contaminants exist in the unweathered unit, appropriate monitoring locations within the unweathered unit should be included in the plan to monitor for potential spreading of these plumes.

Comment 23) Page 78, Table 5.2, An additional Objective C well is necessary to monitor the leading edge of nitrate contamination as it migrates off-site. This well should be located to the north of the plume and north of MW-4013. Further discussion on the specific location of this well is needed.

Comment 24) Page 78, Table 5.2, The Objective C monitoring well trigger is unacceptable. The trigger should be 10 mg/l instead of the proposed 500 mg/l.

Comment 25) Page 79, Table 5.2, The Objective D spring trigger is unacceptable. The trigger should be 10 mg/l instead of the proposed 100 mg/l.

Comment 26) Page 81, Table 5.3, Table 5.3 Preliminary MNA Performance Monitoring for Uranium. The table does not include Objective A characterization monitoring wells. Three new wells in the unweathered portion are required at the location of MW-3024 and MW-3030 southeast of MW-3024. These will be used to help delineate the uranium contamination. The plan must include un-impacted monitoring points in the unweathered zone (for each of the two plumes) beneath the areas of highest uranium concentration. DOE should take the appropriated precaution during installation to minimize migration caused by improper installation techniques.

Comment 27) Page 81, Table 5.3, The Objective B trigger is unacceptable. The trigger should be 100 pCi/l uranium instead of the proposed 300 pCi/l. No basis for the trigger concentration of 300 pCi/l is provided in this plan and the department does not consider 300 pCi/l a reasonable trigger concentration. Based upon historical records the lower concentration of 100 pCi/l is appropriate. Alternatively, use the same test given in the first tier, to determine trigger concentrations for Objective B wells.

Comment 28) Page 81, Table 5.3, If the unexpected high concentration of 300 pCi/l occurs for two consecutive quarters with confirmatory sampling a more active response than recalculating MNA timeframes should be required. Some suggestions include: 1) determine why concentrations are increasing up to 300 pCi/l, 2) reevaluate and possibly change the site model, and 3) investigate possible unknown or un-remediated sources of contamination.

Comment 29) Page 81, Table 5.3, Another contingency action should be added to the second tier for Objective B wells. Because the size of the plume directly affects the MNA timeframe calculation, the contingency action of recalculating MNA timeframes should be initiated if the size of the contaminant plume changes significantly.

Comment 30) Page 81, Table 5.3, An unweathered-zone well MW-3024 and a weathered-zone well MW-3030 are both Objective-B wells for uranium monitoring. The two wells are monitoring different bedrock units, unweathered and weathered. This is another reason why additional unweathered-zone wells beneath both uranium plumes are necessary to fully delineate the vertical extent of uranium contamination.

Comment 31) Page 81, Table 5.3, For locations consistently below 5 pCi/l, the trigger concentration should be 15 pCi/l instead of 20 pCi/l (the MCL.) Such a significant increase in concentration should be evaluated before the MCL is reached. Setting the trigger concentration below the MCL would be consistent with the MNA monitoring plan for TCE.

Comment 32) Page 82, Table 5.3, The Objective C trigger is unacceptable. The trigger should be 20 pCi/l uranium instead of the proposed 100 pCi/l.

Comment 33) Page 82, Table 5.3, The proposed second-tier trigger concentration for the springs at 300 pCi/l is fifteen times the MCL at this point of exposure. A trigger concentration of 100 pCi/l, though higher than the MCL, is reasonable, based on recent sampling results and is more protective than the proposed concentration.

Comment 34) Page 83, Table 5.3, Only established TCE and Nitrate Objective F wells are proposed for uranium Objective F wells. A weathered well should be installed north of MW-3024 for this objective because there is insufficient coverage in this area.

Comment 35) Page 84, Table 5.4, No Objective A wells (unweathered-zone wells) are proposed in this plan. One MNA remedial objective, to verify vertical expansion of the nitroaromatic plume is not occurring, cannot be accomplished unless unweathered Objective A wells are located in the areas of nitroaromatic contamination near MW-2012.

Comment 36) Page 87, Table 5.4, Contingency Actions, Because B-2 wells are discussed on this page, it is suspected that "B-1" included here should be "B-2". In the response to this comment the error was acknowledged, but it was not corrected in August 2003 Supporting Evaluation.

Comment 37) Why are all triggers based on 2,4-DNT and not any of the other nitroaromatics?

Comment 38) Review trigger levels for nitroaromatics!

Comment 39) Page 91, Table 5.4, Table 5.4 Preliminary MNA Performance Monitoring for Nitroaromatic Compounds, Monitoring Well column, page 91. No springs in the Southeast Drainage are proposed for nitroaromatic monitoring. Monitoring for nitroaromatic compounds at springs in the Southeast Drainage should be included. Nitroaromatic compounds are co-located with uranium in the lower springs (SP-5303 and SP-5304). The department understands that the DOE has previously committed to sampling for contaminants of concern, nitroaromatic compounds in this case, when they are co-located with uranium.

Comment 40) Page 92, Table 5.4, There are no proposed Objective F wells located east of the disposal cell, specifically in the Frog Pond area. Objective F well(s) should be added in this area.