GWOU ADMINISTRATIVE RECORD
SECTION TITLE:
GW-500-501-1.25

E. #89753

3945 WSSRAP CHEMICAL PLANT
REPORTS,STUDIES,SAMPLING
SEPTEMBER 1996-PRESENT

Mel Carnahan, Governor • Stephen M. Mahfood, Director

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

April 11, 2001

Ms. Pamela Thompson, Project Manager
United States Department of Energy
Weldon Spring Remedial Action Project
7295 Highway 94 South
St Charles, MO 63304

RE: REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN FOR THE INTERIM REMEDIAL ACTION FOR THE GROUNDWATER OPERABLE UNIT REV A., JANUARY 2001

Dear Ms. Thompson:

The Missouri Department of Natural Resources has reviewed the above referenced document.

The scheduling for chemical oxidation has always been a concern of this department. Evaluation of current data from the Groundwater Operable Unit Field Study (GFS) indicates that the active pumping portion of the study may extend into or beyond June 2001. The Aquifer Recovery Monitoring period is scheduled to extend three months beyond the end of active pumping. It is the department's understanding that the Trichyloroethylene (TCE) impacted area is also the area currently being studied. We are concerned that the effects of the chemical oxidation field testing will impact the results of the GFS. The chemical oxidation pilot scale-test schedule must be defined in this document. A clear determination must be made of how this test will interface and impact the GFS. Pilot scale-testing of the chemical oxidation process should be conducted in an optimized location and must not be compromised by a desire to conduct the testing concurrent with the GFS.

It is important to note that during the last telephone conference, before the GFS plan was finalized, the Department of Energy, the Environmental Protection Agency, and the department agreed that field testing of the chemical oxidation process would not begin until the GFS, including the Aquifer Recovery Monitoring period, had been completed. It was understood and the parties agreed that this could delay field studies of chemical oxidation until late in calendar year 2001. The department is adamant in our position that TCE field testing not start until the end of the Aquifer Recovery Monitoring period.

The department would also like to make two general comments:

Comment 1) Section 1.3, Document Organization; Section 4 Construction Activities, page 2. Section 1.3 lists the remaining sections of the subject document. The inclusion of a summary

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and construction specifications for the activities, which will be undertaken to reclaim the quarry appears to be out of place. Quarry restoration is not mentioned anywhere else in the subject document. It appears that "quarry reclamation" was inadvertently included in Section 4.

Comment 2) Figure 5-1, page 12 and Table 6-1, page 13. No specific time is identified for the pilot scale testing in the schedule illustrated in Figure 5-1. However, the projected cost for pilot scale testing is listed in Table 6-1, "Summary of Costs for In Situ Chemical Oxidation" in the column adjacent to "In Situ Chemical Oxidation of TCE in Groundwater." Clarification should be provided to determine if the time for pilot scale-testing is included in the schedule shown in Figure 5-1.

Sincerely,

HAZARDOUS WASTE PROGRAM

Ben Moore, Projection Manager
Federal Facilities Section

BM:bdp

c: Mike Duvall, Saint Charles County Division of Environmental Services
Dan Wall, U.S. Environmental Protection Agency
Weldon Spring Citizens Commission