GWOU ADMINISTRATIVE RECORD
SECTION TITLE:
GW-500-501-1.29

TP

E92275

YD

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

SEP 06 2002

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

Dear Ms. Thompson:

Re: In-Situ Chemical Oxidation of TCE in Groundwater

The U.S. Environmental Protection Agency (EPA) has examined the results of the pilot-scale treatment and the full-scale work plan for in-situ treatment of trichloroethylene (TCE), developed pursuant to the *Interim Record of Decision for Remedial Action for the Groundwater Operable Unit at the Chemical Plant Area of the Weldon Spring Site*, September 2000 (IROD). On August 6, 2002, representatives of EPA, the U.S. Department of Energy (DOE), and the Missouri Department of Natural Resources (MDNR) met to discuss a path forward on the groundwater operable unit given the results of this pilot-scale work.

As discussed in the August 6 meeting, further treatment on the scale described in the full-scale work plan constitutes a substantial increase in scope of work and cost relative to the remedy identified in the IROD. In our view, any decision to proceed with the full-scale remedy should be considered a post-ROD change in the context of the National Contingency Plan (NCP) § 300.435(c) and would therefore be subject to additional evaluation, documentation, and perhaps an additional public process depending on how significant the change is judged to be. Also, any decision to discontinue treatment would also constitute a post-ROD change since the remedial objective of 5 parts per billion TCE has not been achieved. For guidelines on how to categorize, evaluate, and document post-ROD changes see *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Documents*, OSWER 9200.1-23P, July 1999, which can be found at:
http://www.epa.gov/superfund/resources/remedy/rods/index.htm

As I understand it, a draft proposed plan for the final groundwater operable unit is now planned for December 2002. For the sake of efficiency, the post-IROD change process could be incorporated with the final remedy selection process planned for the groundwater operable unit.

025969

RECYCLE
PAPER CONTAINS RECYCLED FIBERS

SEP 10 2002

A further outcome of the August 6 meeting was the plan to gain agency consensus on the final groundwater proposal as the next step, in advance of developing a proposed plan for agency review. In general, the plan is to bring together designated agency decision-makers for EPA, DOE, and MDNR over the near-term to be briefed on the results of the recent groundwater studies and treatment activities. The range of remedial alternatives would be presented and representatives for each agency would have the opportunity to present program expectations, concerns, or other noteworthy considerations. At some point after the briefing stage, the designated decision-makers for each agency would meet to determine whether a mutually agreeable outline for the proposed plan can be developed. It is imperative that a proposed plan developed in accordance with the agreed upon objectives, stipulations, and constraints meet with acceptance from each agency. Based on discussions through the division management level, EPA is in favor of pursuing this strategy. I will call you and our counterparts with MDNR to discuss next steps.

Please call if you would like to follow up or if you have any questions.

Sincerely,

Daniel R. Wall
Federal Facilities/Special Emphasis Branch
Superfund Division

cc: Larry Erickson, MDNR
Ben Moore, MDNR Field Office
Weldon Spring Citizens Commission