GWOU ADMINISTRATIVE RECORD
SECTION TITLE:
GW-800-801-1.19

PT
TP

Weldon Spring Citizens Commission

7295 Highway 94 South
Saint Charles, Missouri 63304

September 2, 2003

Ms Pamela Thompson
U.S. Department of Energy,
Weldon Spring Site Remedial Action Project
7295 Highway 94 South
Saint Charles, Missouri 63304

Dear Pam:

This letter and the attached comments are to serve as public comment from the Weldon Spring Citizens Commission (WSCC) on the following documents:

- *Proposed Plan for Final Remedial Action for the Groundwater Operable Unit at the Chemical Plant Area, August 2003* (DOE/GJ79491-931) *and*
- *Supporting Evaluation for the Proposed Plan for Final Remedial Action for the Groundwater Operable Unit, August 2003*(DOE/GJ/79491-939).

The WSCC supports the Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA) and the Missouri Department of Natural Resources in the selection of Alternative 3, Monitored Natural Attenuation (MNA) with Institutional Controls (ICs) as the current best solution for the Groundwater Operable Unit (GWOU). However, issues such as trigger levels, vertical extent of the contaminants and the location and number of new wells will require further cooperation between DOE and MDNR before they are resolved. Along with our support for Alternative 3, the Commission expects that the issue of alternative and active cleanup measures be revisited during the 5-year review process when more effective technologies for groundwater cleanup are developed.

The Commission appreciates DOE's open dialog with the Commission that includes your efforts to answer our questions, address and incorporate our concerns and inform us of issues pertinent to the community. The Commission appreciates the opportunity to offer our comments concerning these issues and hopes DOE will provide us with early responses to our comments well before the final PP is issued.

Sincerely,
WELDON SPRING CITIZENS COMMISSION
Rick Hampel, Chair
Paul Mydler, Vice-Chair
Deborah Aubuchon
Fritz Hoffmeister
Donald Price
Thomas Nelsen
Larry Sharp

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Cc: Gale Carlson, Assessment Unit Chief, Dept. of Health
Mike Duvall, Deputy Director, SCC Div. Of Environmental Services
Mimi Garstang, Director, GSRAD
Dave Geiser, Director, USDOE Office of LTS
John Hoskins, Director, MDOC
Ben Moore, Environmental Engineer, MDNR
Joe Ortwerth, County Executive, SCC
Ray Plieness, Deputy Director, USDOE-GJO
Dan Wall, Project Manager Superfund Division, USEPA-Region VII

Attachments (2)

Weldon Spring Citizens Commission
Comments on the Proposed Plan

Comment 1 – The Commission supports a formal agreement between DOE and MDNR that would obligate MDNR to provide oversight for the many years to come.

Comment 2 – The Commission is in favor of some signage that indicates that residual uranium, nitrate etc are present at such places as Burgermeister Spring, the Southeast Drainage and any other locations that the public may actually come into contact with. The Commission is not requesting warning signs, merely informational signs.

Comment 3 – Page 4, Nitrate – Could you include some of the discussion that was present in the Supporting Evaluation (p. 19) concerning nitrate and infants? The discussion was very informative. Could the concentrations of nitrate present at Burgermeister Spring induce methemoglobinemia in an infant after drinking the water once or twice or is the high hazard index based on an infants daily consumption over it's lifetime? Can you clarify this portion of the text presented on page 19?

Comment 4– Page 5, bottom of the page – Is Burgermeister Spring literally the northern extent of direct groundwater transport from the site? No groundwater from the site moves beneath the spring?

Comment 5 - Page 8, Second paragraph, second sentence, discussion of ROD and IROD – Could this be restated in terms that are more easily understood?

Weldon Spring Citizens Commission
Comments on the Supporting Evaluation

Comment 1 – The Commission appreciates the inclusion of trigger levels and corresponding actions and expects DOE and MDNR to arrive at an agreeable solution to the actual numbers. However, *changes in concentration,* in addition to triggers, are great indicators of potential problems. For example, suppose the concentration of TCE in a downgradient well (weathered) goes from 1or 2 ug/L to 10 ug/L, but has not reached a trigger level. The Commission considers this a "significant" change. Will changes in concentrations of the contaminants within and outside the plume result is some action such as additional monitoring or an evaluation to determine the cause? If so, can you define for the Commission, what DOE considers a "significant" change?

Comment 2 – The trigger levels, that monitor movement of the plume, are based on wells located downgradient of the plume. Does this cover sentinel wells that are downgradient, but not directly in the flow path? What happens if hydraulic changes occur, that redirects the flow toward Burgermeister along a similar but slightly different pathway? Will sentinel wells downgradient, but not directly in the current flow pathway, be monitored to detect an aberrant movement of the groundwater? In other words, are there enough wells selected for future monitoring that will include this situation?

Comment 3 – Page 46, third paragraph, third line – The text states that "uranium could be sorbed by sedimentary material or plants in the spring." What levels are currently present in the sediment and the plants? In the future, does DOE plan to test sediment and plant matter in the Spring?

Comment 4 – Page 46, paragraph 4, line two – The text indicates that potentially contaminated water would flow into Lake 34 and then to Dardenne Creek. Have levels in Dardenne Creek always been below background? Does DOE plan to sample Dardenne Creek and the sediment and surface water in the lakes in the future? The Commission is in favor of the collection of sediment, surface water and fish tissue from Lake 34 on a regular basis.

Comment 5 – Page 55, third paragraph – The text states that 5-year reviews would be conducted because "contaminants would remain in the site groundwater at levels above those that allow unlimited use and unrestricted exposure." Does this statement also include Burgermeister Spring and the Southeast Drainage? If it does, could these two areas be added to the above statement? Aren't ICs required and planned for these two areas? The Commission also recommends signage.