GWOU ADMINISTRATIVE RECORD
SECTION TITLE:
GW-300-301-1.07

ENGINEERS
AND
CONSTRUCTORS

MORRISON KNUDSEN CORPORATION

MK - FERGUSON GROUP

WELDON SPRING SITE REMEDIAL ACTION PROJECT
7295 HIGHWAY 94 SOUTH
ST CHARLES, MISSOURI U.S.A. 63304
PHONE (636) 441-8086

#89154

FEBRUARY 05 2001

U.S. Department of Energy
Weldon Spring Site
Remedial Action Project
ATTN: Pamela Thompson
Project Manager
7295 Highway 94 South
St. Charles, MO 63304

SUBJECT: Contract No. DE-AC05-86OR21548
GROUNDWATER OPERABLE UNIT ADDITIONAL GROUNDWATER FIELD STUDIES - UNDERGROUND INJECTION CONTROLS PERMITTING

Dear Ms. Thompson:

Under section 121(e) of the Comprehensive Environmental Restoration Compensation and Liability Act (CERCLA), remedial actions that take place on site are exempt from all Federal, State, and local permits. Therefore, additional groundwater field studies to be performed at the chemical plant will not require an Underground Injection Controls (UIC) Permit for construction and operation under 10CSR20-6. However, review of 10CSR20-6 indicates other requirements regarding surface water discharges and monitoring well construction that would be applicable.

For informational purposes, a copy of the field sampling plan should be forwarded to the Missouri Department of Natural Resources (MDNR), Water Pollution Control Program (WPCP). This report should provide adequate information to assure the MDNR that design, siting, monitoring, and operating requirements for this activity take into account the need to minimize impact on the groundwater and surface water systems in the area. This report should be provided to MDNR, Water Pollution Control Program (WPCP), for informational purposes. It is not intended to fulfill the application process.

MORRISON KNUDSEN CORPORATION
MK-FERGUSON GROUP

A draft letter of transmittal to the MDNR-WPCP discussing pertinent parts of the project is enclosed for your use.

If you have any questions or comments regarding this project, please contact Rebecca Cato at extension 3507.

Sincerely,

Douglas E. Steffen
Project Director

DES/rc/cju

Enclosure: as stated

#89154

DRAFT LETTER

Mr. Tim Stallman
Division of Environmental Quality
Water Pollution Controls Program
P.O. Box 1368
Jefferson City, MO 65102

Dear Mr. Stallman:

UNDERGROUND INJECTION OF POTABLE WATER AT THE WELDON SPRING SITE

The Department of Energy at the Weldon Spring Site is preparing to perform additional groundwater field studies to decide whether enhancement of a conventional pump and treat system can significantly improve contaminant removal rates as compared to conventional pump and treat methods. Several variations will be evaluated, including injection of potable water to provide additional recharge to the aquifer and use of an angled extraction well to increase the likelihood of intersecting vertical flow paths in the subsurface.

A plan (enclosed) outlining the components of this study has been prepared in consultation with the Environmental Protection Agency (Region VII) and the Missouri Department of Natural Resources (Federal Facilities Group and Division of Geology and Land Survey). This plan provides information to ensure that the design, siting, monitoring, and operating requirements minimize impact on the groundwater and surface water in this area.

Injection will be performed in two wells screened in the weathered portion of the Burlington-Keokuk limestone, the uppermost bedrock unit at the chemical plant. The maximum injection rate during the study will be 10 gpm in each well. Maximum water levels in the injection wells will be limited to reduce the potential for uncontrolled migration of water out of the study area. Potable injection water will be used throughout the study. It is expected that the extraction rate from either pumping well will not exceed 30 gpm during the study. Sampling will be performed in wells in the area and springs that could be influenced by activities at the chemical plant. This sampling will occur during and after the study to monitor for possible impact. It is expected that the impact will be minimal due to the short duration of the study.

Construction of extraction and injection wells used for this study is in accordance with 10CSR23-3.030, *Well Construction Code*. Well installation subcontractors working at the Weldon Spring site register their work in accordance with these regulations.

Groundwater extracted during this study will be treated and