

**GWOU ADMINISTRATIVE RECORD**

**SECTION TITLE:**

**GW-500-501-1.03**



Neil Camahan, Governor • David A. Shoer, Director

## DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY  
P.O. Box 176 Jefferson City, MO 65102-0176

April 23, 1997

Mr. Steve McCracken  
Director  
U.S. Department of Energy  
Weldon Spring Site Remedial Action Project  
7295 Highway 94 South  
St. Charles, Missouri 63304

Certified Mail/Return Receipt  
Receipt No. P 162 259 087

Mr. Steve Iverson  
U.S. Department of the Army  
Corps of Engineers, Kansas City District  
ATTN: CEMRK-MD-H-KC District  
700 Federal Building  
601 E. 12th St.  
Kansas City, Missouri 64106-2896

Certified Mail/Return Receipt  
Receipt No. P 162 259 088

Ref. 1. M. Windsor, MDNR, letter to J. Van Fossen, WSSRAP, and S. Iverson,  
USACE, 3/24/97

Dear Messrs. McCracken and Iverson:

Pursuant to the Weldon Spring Site Remedial Action Project (WSSRAP) and the Weldon Spring Ordnance Works (WSOW) Federal Facility Agreements, we submit this statement of dispute regarding the Draft Final *Remedial Investigation for the Groundwater Operable Units at the Chemical Plant Area and the Ordnance Works Area, Weldon Spring, Missouri* and the Draft Final *Baseline Risk Assessment for the Groundwater Operable Units at the Chemical Plant Area and the Ordnance Works Area, Weldon Spring, Missouri*, both dated February 1997.

Our comments (Reference 1) on the above referenced *Remedial Investigation (RI)* and *Baseline Risk Assessment (BRA)* of the WSSRAP/WSOW Groundwater Operable Units (GWOU) were timely submitted on March 24, 1997. Our March 24 submittal is incorporated herein by reference and describes the nature of the dispute, the work affected by this dispute, our position with respect to the disputed issues, and the technical, legal, or factual information upon which we rely to support our position.

Due to the unavailability of DOE contractor personnel, we have had but one meeting with your staff to discuss the issues raised in our submittal, and, thus, the issues remain unresolved. We believe resolution of this dispute requires determination of the

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appropriate Reasonable Maximal Exposure scenario; adequate characterization of the nature and extent of contamination, including additional long term monitoring of contaminants and installation of one or more monitoring wells; demonstration of compliance with quality assurance/quality control of chemical parameters; determination of water loss within the Southeast Drainage; and appropriate revision of the RI and BRA. We do not agree to issuing the final RI or BRA until this dispute is resolved.

We look forward to working with you and your staff to informally resolve these issues and, thereby, avoid elevation of this dispute. Please contact Martha Windsor at the Missouri Department of Natural Resources WSSRAP Field Office at 314-441-8030.

Sincerely,

HAZARDOUS WASTE PROGRAM



Glenn A. Carlson, P.E.  
Project Manager

Encl:

cc: Weldon Springs Citizen's Commission  
Dan Wall, USEPA Region VII  
Tom Lorenz, USEPA Region VII  
Missouri Department of Conservation