GWOU ADMINISTRATIVE RECORD
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MISSOURI DEPARTMENT OF CONSERVATION

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JERRY M. CONLEY, Director

April 3, 1998

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

Dear Mr. McCracken:

Thank you for the opportunity to comment on the March, 1998 draft of the *Feasibility Study For Remedial Action For The Groundwater Operable Units At The Chemical Plant Area And The Ordnance Works Area, Weldon Spring, Missouri.*

As you know, the Missouri Department of Conservation is owner of more than 14,000 acres surrounding the Weldon Spring Chemical Plant and Weldon Spring Training Area. Our ownership constitutes the majority of non-Federal land potentially impacted by groundwater contamination from the chemical plant and activities associated with it.

Our agency is interested in the cleanup process both from the standpoint of being an agency responsible for fish, wildlife, and forest resources and also as impacted landowner. We rely heavily on the expertise of the Department of Health and the Department of Natural Resources in matters pertaining to public health and environmental quality. There appear to be no current detrimental impacts to aquatic or terrestrial wildlife resulting from groundwater contaminants, as outlined in this report.

The alternatives selected for final consideration would not actively remediate groundwater contamination, except TCE, as it affects non-Federal (i.e., Department of Conservation) lands. Responsibility for providing protection from remaining contaminants would appear to rest largely on this agency, to be accomplished by not using groundwater and prohibiting its future use through deed restrictions. Table 2.1 Summary of Screening Analysis for Institutional Controls, notes that "The DOE and DA have accountability for as long as contamination is present." Further comments in the table note that "Ownership and use of deed restrictions would be easy to implement, and resources would be readily available" and that the cost would be "low". Restricting all further extraction of groundwater and minerals from our lands is not without "cost" to our agency and the Missouri Conservation Commission has not agreed to this action.

COMMISSION

ANITA B. GORMAN — RANDY HERZOG — RONALD J. STITES, Plattsburg — HOWARD L. WOOD, Bonne Terre

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The report does not indicate how much of our property would be restricted or its location. Presumably a deed restriction would be "in perpetuity."

The monetary value of land is usually negatively impacted by deed restrictions. As indicated in previous correspondence, our agency has no plans to sell these lands in the foreseeable future, but *never* doing so is not a foregone conclusion. Also, sale of water or mineral rights could be considered. The option of using groundwater for our own purposes also has value, even though we have no immediate need for it.

This agency will continue to cooperate in planning and implementation of appropriate remedial actions. We believe the report should better reflect the negative aspects, to non-Federal interests, of passive remediation alternatives.

Sincerely,

JAMES P. FRY
POLICY COORDINATOR

JPF:vch

c: Larry Erickson, Department of Natural Resources
Mike Schroer, MDC-St. Louis Reg.