GWOU ADMINISTRATIVE RECORD
SECTION TITLE:
GW-500-501-1.13

Karen / Yvonne

STATE OF MISSOURI
Mel Carnahan, Governor • Stephen M. Mahfood, Director
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

December 31, 1998

GW-500-501-1.13

Mr. Steve McCracken, Project Manager
United States Department of Energy
Weldon Spring Remedial Action Project
7295 Highway 94 South
Weldon Springs, MO 63304

Mr. Dan Wall, Remedial Project Manager
U.S. Environmental Protection Agency, Region VII
726 Minnesota Avenue
Kansas City, KS 66101

RE: DRAFT FINAL: PROPOSED PLAN FOR REMEDIAL ACTION FOR THE GROUNDWATER OPERABLE UNIT AT THE CHEMICAL PLANT AREA OF THE WELDON SPRING SITE, WELDON SPRING, MISSOURI (DECEMBER, 1998)

Dear Messrs. McCracken and Wall:

The Missouri Department of Natural Resources (MDNR) remains ready to work with the U.S. Department of Energy (DOE) and U.S. Environmental Protection Agency (EPA) toward the finalization of the Groundwater Operable Unit Proposed Plan and eventually the Record of Decision. The Proposed Plan for this operable unit is one of the final major documents remaining in the remediation of the Weldon Spring Site Remedial Action Project. However, the subject document is unacceptable according to the CERCLA process for the following reason.

The DOE has not submitted a final version of the Feasibility Study (FS) for the Groundwater Operable Unit. Although responses to comments made on the FS have been received, many of the responses have not provided an adequate explanation or substantiated resolution. Without a final acceptable version of the FS, MDNR cannot accept this Proposed Plan. The Proposed Plan references the FS and thus can not be recognized until a final version of the FS is submitted.

Further issues associated with this document include the Department of Energy inadequately addressing the nitrate contamination at the Chemical Plant area. This contamination is not *"distributed in small, noncontiguous areas throughout the chemical plant area"* as stated in this Proposed Plan. The nitrate contamination spans over 145 acres with concentrations averaging 10 times the EPA's Maximum Contaminant Level (MCL). Also, based on some of the discussion in the Proposed Plan, there is speculation that the new data obtained from the recent Pilot Pumping Test may not have been considered for the nitrate, uranium and 2,4-DNT plumes. The DOE plans to use monitoring as a means of meeting nitrate, uranium, and 2,4-DNT Applicable or Relevant and Appropriate Requirements (ARAR). The MDNR believes that waiting several years for the contaminants to attenuate (dilute), without an attempt to treat or

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contain is not a means of meeting ARAR. Preliminary review would indicate that the Technical Impracticability (TI) procedure should be applied.

The MDNR will proceed with an informal review of this document and provide preliminary comments. However, formal review cannot proceed until the final FS is received and proper sequencing of CERCLA documentation is observed. Please contact Mr. Branden Doster of my staff at (573) 526-2739 if you have questions concerning these issues.

Sincerely,

HAZARDOUS WASTE PROGRAM

Larry V. Erickson

Larry V. Erickson, P.E., DOE Unit Chief
Federal Facilities Section

LVE:bdg