GWOU ADMINISTRATIVE RECORD
SECTION TITLE:
GW-500-501-1.21

Karen/Yvonne

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

MAY 03 1999

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

Dear Mr. McCracken:

Re: Draft Supplemental Feasibility Study for Remedial Action for the Groundwater Operable Unit at the Chemical Plant Area of the Weldon Spring Site (March 1999)

General Comments

1. Although there are no prospects for complete groundwater restoration over the foreseeable future, the DOE should consider proposing localized active measures that are cost-effective and have a reasonable prospect of achieving significant reduction of groundwater contamination over a reasonable time-frame. Based on the information provided, it appears that no approach will result in the attainment of ARARs within a time-frame that can be reasonably planned for (in some instances 1000s of years). To the extent this conclusion continues to be verified through remedial action monitoring, the DOE should consider pursuing waiver of these ARARs based on technical impracticability.

2. Likewise, natural attenuation processes will not lead to complete groundwater restoration over the foreseeable future. Over time, however, these processes will have a mitigating effect on groundwater contamination and should be a recognized component of the remedial approach. The processes by which this will occur, i.e, dilution, dispersion, and sorption, will need to be verified through long-term monitoring.

3. Contaminants above health-based levels will remain in groundwater for the foreseeable future and well beyond. Groundwater use restrictions, therefore, will be a fundamental component of any remedial strategy. As with other components of the remedy, institutional controls (IC) must be evaluated for implementability, cost, permanence, etc. Performance standards should be written into the ROD. As much detail as possible should be provided on what uses will need to

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understanding and monitoring the processes that lead to decreasing contaminant availability and concentrations.

Page 41, Methodology–Explain why a "minimum" number of extraction wells was used in this evaluation rather than an "optimum" number? Also, why are the wells located such that they result in "conservatively long" cleanup times? The described approach seems counterintuitive assuming we are trying to estimate optimal effectiveness.

Thank you for the opportunity to review this document. Please call me at (913) 551-7710 if you have any questions.

Sincerely,

Daniel R. Wall
Remedial Project Manager
Federal Facilities/Special Emphasis Branch
Superfund Division

cc: Larry Erickson, MDNR