GWOU ADMINISTRATIVE RECORD
SECTION TITLE:
GW-800-801-1.06

87908

St. Charles County Government

Department of Community Health
and the Environment
Gil Copley, Director
Division of Environmental Services
Mike Duvall, Director

August 15, 2000

Mr. Stephen H. McCracken, Project Manager
Weldon Spring Site R~medial Action Project
7295 Highway 94 South
St. Charles, MO 63304

Re: Comment Period for Proposed Plan for Remedial Action for Groundwater Operable Unit #1 at Weldon Spring Site

Dear Steve:

n response to the comment period for the proposed plan for remedial actions at WSSRAP, and to SEPA's May 12, 2000 final decision regarding the dispute resolution process, St. Charles County ivision of Environmental Services appreciates the opportunity to offer the following guidance and osition.

ntly, there does not appear to be sufficient information compiled for treating the contaminated oundwater to predict how certain remedies would actually perform. We would like to see full onsideration given to estimating restoration potential of the groundwater. We feel the information esented in the MDNR-DGLS document prepared by Dr. Jim Williams dated March 10, 2000 scussing the premature termination of pump testing in October of 1998 provides compelling ionale for reconsideration of the proposed treatment of the remaining groundwater contamination. e concur with the stated MDNR position on the subject.

e Remedial Investigation and Feasibility Study is a guide process and subject to interpretation by stakeholders. EPA-Region Seven states (*EPA, Dennis Grams, 05-12-00, p.3, ref.* which ediation to choose) interprets the RIFS guidelines as "not to exhaust all avenues for data hering to define performance of a remedial alternative. Rather, its purpose is to gather sufficient ormation to put boundaries on performance and allow an estimate of restoration potential." Dr. lliams states this was not achieved by DOE during its investigation period. We believe this pretation by Administrator Grams may suffice in some CERCLA projects, but may require more ibility at WSSRAP.

also request that full consideration be given to on-site post-construction management and long stewardship issues. This plan should exist as a proactive detailed design, more so than a ngent, reactive response. The stewardship plan should identify all parties responsible for ardship activity, local office locations and describe their control obligations including activity frame projected for the foreseeable future.

201 North Second Street • Suite 433 • St. Charles, MO 63301
Phone 636-949-7415 • Fax 636-949-7519

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St. Charles County, along with the State, is also interested in future damage assessments and compensation for injuries to natural resources at and beyond the WSSRAP site. The County is in a position to act as one of the Trustees for the State, if so needed, and welcomes DOE's commitment to meeting the requirements of the Natural Resources Damages Act following cessation of remediation activities.

We appreciate the extensive time and effort spent in compiling the information presented to us and look forward to a proposed groundwater remediation and stewardship plan that reflects the best interests of the public and environment of St. Charles County. We likewise acknowledge and commend DOE on the overall remedial WSSRAP progress completed and documented to date.

Sincerely,

M. Duvall SLL for MD

Mike Duvall, CHMM
Director, Division of Environmental Services

MD/MH/sll

cc: Joe Ortwerth, County Executive
Gil Copley, Director, St. Charles County Department of Community Health and the Environment
Robert Geller, Federal Facilities Section Chief, MDNR-HWMP
Glenn Hackey, Chair, Weldon Spring Citizens Commission