GWOU ADMINISTRATIVE RECORD
SECTION TITLE:
GW-800-801-1.11

Weldon Spring Citizens Commission
7295 Highway 94 South
St. Charles, Missouri 63304

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July 24, 2000

Mr. Stephen McCracken, Project Manager
United States Department of Energy
Weldon Spring Site Remedial Action Project Office
7295 Highway 94 South
St. Charles, Missouri 63304

Re: *Second comment period for Proposed Plan for Remedial Action for the Groundwater Operable Unit at the Chemical Plant Area of the Weldon Spring Site, June 1999 (DOE/OR/21548-733).*

Dear Mr. McCracken:

This letter is in response to the USEPA's final decision rendered on May 12, 2000 regarding the dispute resolution process concerning the *Record of Decision for Remedial Action for the Groundwater Operable Unit at the Chemical Plant Area of the Weldon Spring Site*, September, 1999 (DOE/OR/21548-[illegible]). The Commission appreciates the opportunity to offer whatever guidance and perspective we can in operationalizing a workable plan to address the contamination of groundwater under the chemical plant area as well as adjacent areas that may be potentially impacted in the future. Based upon discussions with a representative from EPA's regional office at our last Commission meeting, it is clear that the initial proposed remedy has remained essentially intact with the addition of some suggested considerations for pilot studies to further clarify site hydrogeolic characteristics. This being the case, the general thrust of out comments remain substantially unchanged from our last response on July 7, 1999, although many aspects have been addressed or clarified since last year.

To summarize, the Commission agrees with the proposed action as described in alternative #9, combined with long-term monitoring of the groundwater and springs. This agreement is contingent upon additional strengthening of the plan most notably in the areas of contingency planning and long-term stewardship. We feel it is appropriate to address stewardship issues in this document since a stewardship plan is referenced in Section 2 of the GWOU ROD published in September, 1999. It is recognized that many of the stewardship issues identified here are currently under discussion and review and the progress is encouraging, however, these issues should be documented as a matter of public record and are thus included as part of this formal public response.

Our specific comments are presented below and are organized by major issue area.

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Issue #1 - Contingency plans

The proposed plan (alternative #9 + alternative #2) calls for waiting an appropriate amount of time (2-3 years) for the effects of the source reduction of uranium, nitroaromatics, and nitrate's around the ash pond and raffinate pits to be evaluated. The anticipated outcome, over time, is a decreasing concentration in the groundwater for all contaminants. The proposed plan calls for the incorporation of alternative #2 (long-term monitoring) to supplement the active remediation described in alternative #9. The only mention of contingency planning under either of these alternatives was in the FS in the discussion of alternative #2 where contingency measures aimed at developing alternative water supplies (drinking) for the public are discussed.

Uncertainties regarding the possible mobilization of uranium contamination in a shallow aquifer, although remote, suggest the desirability of contingency plans addressing possible *increases* in contamination concentrations to surface springs in the area and the associated risks to recreational visitors. Although the Commission believes contamination levels in groundwater will most likely decrease after the source removal, we believe it would be prudent to have, as a part of the plan, a more detailed contingency plan. The plan should outline a range of protective actions that address both surface water sources as well as drinking water sources complete with contaminant specific trigger levels for each action. The well field contingency plan provides a model of the type of stage[illegible]trols and action levels we envision.

The issue of planned responses to exceedences of monitoring parameters and emergencies was brought up in the Commission's comments to REV. B of the DOE site stewardship plan. It was generally agreed that some form of contingency planning was advisable for a limited set for "credible and foreseeable events". Identification of these events is still needed as well as specificity in how these events would be dealt with (e.g. who is responsible for addressing problems?, how long does the process take?, who will be notified?, etc.).

Issue #2 - Comprehensive stewardship plan

The chosen alternative *should incorporate some form of long-term stewardship plan* as a supplement to the long-term monitoring and active remediation components proposed. If groundwater use restrictions will be required of adjacent landowners for the foreseeable future, then the anticipated stakeholders must be identified and the roles and responsibilities of all potentially impacted parties need to be considered.

Contamination above acceptable health based levels is likely to be present in the groundwater for at least the next 20-30 years. This will require some form of use restrictions that may well extend beyond DOE's property boundaries. The institutional controls and stakeholder agreements that will likely be necessary are currently under discussion and more detailed explanations are being developed in a sequential manner. The Commission agrees with this approach since information necessary to fully define many of the controls may not be available until years after the cell is closed.

The draft stewardship plan that the Commission has reviewed and submitted initial comments on is an encouraging first step toward addressing many of the long-term comprehensive issues of concern to the Commission. We welcome the opportunity to work with the DOE and the other stakeholders in the further refining of this plan as an integral part of the comprehensive remedy for the GWOU and site as a whole.

Issue #3 - TCE cleanup goal/strategy

The proposed alternative #9 does not specify exactly how many rounds of injection are to be administered, only a minimum (2). The stated objective of alternative #9 is to achieve a TCE concentration of 5ug/L or less. If the technology is unable to achieve the stated goal after a minimum number of injections, how will the DOE determine what ultimate level of remaining contamination is acceptable? In other words, how will the decision be made to either proceed with further rounds or to end the process?

The rationale in the GWOU ROD, September, 1999 (Sec. 6.7) states that injection will continue "for so long as the application is reducing the TCE concentrations in a cost-effective manner." Determining when the performance of the process is asymptotic is as much judgment as it is science and coupled with the added criteria of cost-effectiveness (another interpretive and debatable criteria) makes this rationale virtually open-ended. As a guidance and goal setting tool it is fine, but it is, in the Commission's opinion, too loose to be considered as a true performance benchmark.

The Commission recommends that the rationale for determining when the process should be concluded or extended needs to be decided, described, and explained in more finite terms beforehand. It is recognized that bench scale testing is required and the innovative nature of this approach has a measure of uncertainty associated with it. This is all the more reason to be up-front with the realistic limitations of what is achievable using the proposed technology and detailing the decision strategy so the public can track field vs. expected performance against a decided upon criteria. Establishing the strategy or decision parameters beforehand will hopefully minimize disputes over what is or is not the appropriate time to end or continue the remediation operation.

In summary, the Commission agrees with the proposed action as described in alternative #9, combined with long-term monitoring of the groundwater and springs. The Commission is also inclined to agree with the premise that mechanisms of natural attenuation will, over time, lessen the levels of contamination that remain in the groundwater at the chemical plant site. This agreement is, however, contingent upon the resolution of the issues identified in the comments above. The prospects for long-term community acceptance of this, the last of the major remediation components of the Weldon Spring Site, is inextricably tied to the government's commitments and responsibilities expressed in the Stewardship Plan referenced in this ROD.

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The continued dialog with stakeholders in the evolutionary development of this plan will be the true testament to the ultimate success or failure of this project.

Sincerely,

Weldon Spring Citizens Commission

Weldon Spring Citizens Commission
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