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

November 30, 2001

Pamela Thompson
WSSRAP Project Director
United States Department of Energy
Weldon Spring Site Remedial Action Project Office
7295 Highway 94 South
St. Charles, Missouri 63304

Re: *Weldon Spring Site Stewardship Document for Operations and Maintenance,* July 2001, Rev. 1, (DOE/OR/21548-771)

Dear Ms. Thompson

Our specific comments on the above referenced stewardship document are attached.

We hope this level of honest and open dialog will continue into the future and we appreciate the opportunity to offer our comments as a community perspective on this stewardship effort. Please contact our Commission office if you require additional information or clarification on particular points.

Sincerely,
Helene Deller for Richard Hampel

Weldon Spring Citizens Commission
Richard Hampel, Chair
Paul Mydler, Vice-Chair
Deborah Aubuchon
Fritz Hoffmeister
Thomas Nelsen
Donald Price
Larry Sharp

cc: Joseph Enright, DOE
Glenford Newtown, DOE
Thomas Pauling, DOE
Dan Wall, EPA Region VII
Larry Erickson, MDNR
Robert Geller, MDNR
Ben Moore, MDNR
Joe Ortwerth, St. Charles County Executive
Mike Duvall, St. Charles County Director Environmental Services

cc: Melissa Lutz, PRC
Yvonne Deyo, PAI

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WELDON SPRING CITIZENS COMMISSION
Comments on
WELDON SPRING SITE (WSS) STEWARDSHIP DOCUMENT FOR OPERATIONS AND MAINTENANCE
U.S. Department of Energy (DOE), July 2001, Rev. 1, DOE/OR/21548-771

1. Section 1.3, para 2, page 4 – The first three sentences are not clear. What is meant by "criteria" and the discussion on ALARA? Could you please add or revise the text to clarify?

2. Section 1.3, para 2, page 4, 2nd sentence – The public may have difficulty understanding what is "deemed protective under a risk scenario". The addition of a glossary to define "protective level" and the discussion of risk later in the paragraph are helpful, but the general public would be better served if the actual values that are deemed protective were provided. What is needed is an appendix or short supplemental document that includes numeric values for:

   A. Cleanup levels for soil, surface water, sediment, and groundwater (if applicable) for each operable unit;
   B. Criteria deemed protective for the contaminants of interest;
   C. List of other pertinent standards that must be met for leachate, NPDES permits, or other applicable permits;
   D. Action levels for residential contaminants or leachate.

   Reviewing monitoring data and keeping the public informed will be extremely difficult without this information. The listing of actual values will provide the public with something to measure the effectiveness of monitoring and may perhaps avoid unnecessary questions concerning previous cleanup efforts performed at the quarry, chemical plant, vicinity properties, and applicable off-site locations.

3. Section 1.3, page 5 – The revised discussion of vicinity properties on page 5 is clear and to the point. There is one discrepancy with the revised discussion and the short discussion of vicinity properties on page 3, para 1. On page 3, the number of vicinity properties appears to be small ("several small locations" and "two wildlife areas"). Para 2 on page 5 indicates that there are 18 vicinity properties. Can this discrepancy be clarified?
4. Page 5, para 4 – The revised discussion of the Frog Pond culvert is good. The discussion says the area does not qualify for unrestricted use and then states that "the need for ICs will be evaluated". If the area does not qualify for unrestricted use, shouldn't ICs be required rather than the need for them "evaluated"?

5. Page 6, para 3 – The text mentions ICs north of the slough for groundwater usage. Shouldn't additional ICs be required to restrict disturbance of the reduction zone? This zone is extremely shallow. Excavation and/or subsurface construction in this area or along the northern bank of the slough could disturb this zone and possibly result in the movement of contaminants to locations south of the slough.

6. Page 8, section 1.5 – The Commission is aware that the text of this section has been revised based on comments from USEPA. This section mentions the enforceability of ICs under the various RODs (which fall under FFA). The text does not, however, mention the enforceability of stewardship itself. The enforceability of stewardship is of great concern to the Commission and the community. A statement concerning the enforceability of stewardship and stewardship issues (not just ICs) should be added to this discussion. If the Stewardship Plan is not enforceable, what recourse will the public have in the future?

7. Figure 1-2:

   a. The box that asks "Does Remedy continue to be Protective?" – If the answer is "no", the selected remedy should be re-evaluated and the Stewardship Plan should be revised, as needed.

   b. The box that asks, "Have Protective Levels been achieved?" – If the answer is "yes" the Commission does not agree that the LTM activity should be eliminated. The LTM Plan should be modified (the frequency of the activity should be modified). What happens if the levels increase (such as through disturbance of the reduction zone or the appearance of high levels of contaminants at new locations i.e. nitroaromatics near Frog pond)? Some contingency should be provided for these situations.

8. Section 2.1, general comment on funding – The Commission would like to see some effort to develop a funding mechanism to set aside adequate funds for stewardship at this site. Since funding will be on an annual basis the Commission would like to see a funding mechanism developed to set aside adequate funds for stewardship at this site. This could include a trust fund or some other type of funding.

9. Section 2.1, para 2 – Could the last two sentences be revised as follows? "DOE will provide upcoming yearly funding estimates in the annual site reports so citizens have input into the funding process. Annual site reports are usually published in the late summer prior to submittal of the budget request."

10. Section 2.1, para 3 – Shouldn't the text refer to DOE, Idaho instead of DOE, Albuquerque?

11. Page 12, 1st line – The Commission would like to see the WSCC added to this sentence along with the local agencies.

12. Page 14, surveillance example – The Commission would like to see the second sentence revised to: "Institutional controls will be verified annually and evaluated during each 5-year review…" Will the details of how the ICs will be verified be included in the LTM?

13. Page 14, public participation example – The Commission believes public meetings should be held at a minimum of once a year. The Commission would like the phrase "may be held on an annual basis" deleted.

14. Page 15, para 4, sentence 4 – Action levels/contingencies are based on monitoring. The Commission is concerned about the potential for a significant lag time between discovery of a problem, reporting of the problem (or notification of the community that a problem exists) and implementation of contingencies. Does DOE have a plan to ensure that the lag time will be minimal?

15. Page 15, para 4, last sentence – In addition to the responsibilities listed for the Commission, the WSCC plans to review data on a regular basis (not just an annual basis). The Commission will need a small budget to provide the input specified in this sentence.

16. Page 15, para 5 – What is reference "XX"? Could the Commission receive a copy of this document?

17. Page 16, first full sentence – Could you clarify what is meant by "deemed necessary" or revise this sentence as follows: "Based on data results, risk assessment will be performed by ANL." ?