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▸▸AUTHOR WSCC ▸▸TO MCCRACKEN, S. ▸▸DATE 07/08/99

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Weldon Spring Citizens Commission
100 North Third Street - Room 107
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July 8, 1999

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: *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 above referenced plan that we received June 21, 1999. The Commission appreciates the opportunity to offer whatever guidance and perspective we can in the development of 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. After review of the referenced plan, 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.

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

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 nitrates 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 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 wellfield contingency plan provides a model of the type of staged controls and action levels we envision.

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 should be discussed and explained in detail in the proposed plan. This discussion should obviously be addressed in the stewardship plan currently under development as these considerations are equally important to the long-term viability of the final remedy as the other elements identified in the proposed plan (e.g. alternative #2 & #9).

The draft stewardship plan that the Commission 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 for *inclusion into the proposed final alternative.*

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 5 ug/L or less. If the technology is unable to achieve the stated goal after a minimum number of injections, how will 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 Commission recommends that the rationale for determining when the process should be concluded needs to be decided, described, and explained beforehand. If there are realistic limitations to what is achievable using proposed technology, they need to be detailed in the plan and the decision strategy *decided up-front* for public input as opposed to negotiation after the fact. Establishing the strategy or decision parameters beforehand will hopefully minimize disputes over what is or is not the appropriate time to end the remediation operation.

Issue #4 - Institutional controls

The most recent information from the transition planning group indicates that the DOE intends to lease the administration building to the local school district. The exact timing for this transfer has not been finalized, however, if there are remaining active remediation processes within the immediate vicinity, special precautions will be required to protect possible unintended (overly

curious) access by students. If at all possible, the Commission recommends that all active remediation operations (maintenance operations excluded) should be concluded before occupancy by the school district is granted.

Issue #5 - Risk uncertainties

The current risk scenario of a recreational visitor indicates extremely low health risks to contaminated groundwater including surface springs. While the risk models use conservative assumptions for routes of exposure, would increased frequency by high school science groups significantly change the relative risk described in the recreational visitor scenario? If so, institutional controls need to be revisited to insure that this subgroup is sufficiently protected.

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 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. That is why we encourage the integration of the Stewardship Plan into both this proposed remedy (by reference since it is still in development) and the upcoming Record of Decision.

Sincerely,

Weldon Spring Citizens Commission

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