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Mrs. Leo Drey
515 West Point Avenue
University City, MO 63130

October 4, 1990

Mr. James E. McKee, Jr.
Community Relations Manager
Jacobs Engineering Group, Inc.
Weldon Spring Site Remedial Action Program
7295 Highway 94 South
St. Charles, MO 63303

Dear Jim:

The need to clean up the Weldon Spring waters is undeniable -- and the sooner it is accomplished, the better. The question I keep raising is whether it might not be safer to pump out and clean the contaminated Quarry water, release it into a lined evaporation pond, and retain it there for several years for additional monitoring before releasing it irretrievably into the Missouri River -- upstream from St. Louis. Perhaps by then more sophisticated, reliable monitoring equipment will have been developed for alpha-emitters, etc., and more experience elsewhere in the country for the removal of uranium, etc.

This letter has within it the request for four sets of documents concerning the Department of Energy's water proposals:

(1) May I please have a copy of the Responsiveness Summary on the Quarry water?

The following documents were offered to the public, upon request, in the Department of Energy's April 2, 1990, letter announcing that a Finding of No Significant Impact (FONSI) had been issued on the proposal to treat and then discharge the Weldon Spring Quarry water into the Missouri River: (1) the Engineering Evaluation/Cost Analysis of January 1989; (2) the Responsiveness Summary which "was prepared following the public comment period" on the EE/CA; and (3) the FONSI.

The April 2 letter also announced that: "The EE/CA and Responsiveness Summary have now been adopted as an Environmental Assessment (EA) (DOE/EA-0412) for compliance with the National Environmental Policy Act (NEPA) of 1969." (emphases added)

On April 6 I wrote to you to ask for a copy of the above three documents. And then after receiving only the EE/CA and the FONSI, I wrote to you again on April 21 -- to ask for a copy of the Responsiveness Summary which I assumed had been omitted from the mailing by mistake.

In an undated letter I received on April 25 you noted: "Responsiveness Summary will be mailed when ready." (emphasis added) I asked again for the Summary on August 16 during my oral testimony at the public meeting in St. Charles on the proposed discharge of the Chemical Plant Pit water. And on August 27 I mailed one more request to you.

On August 29 you mailed a Responsiveness Summary to me with a note saying,

TR-1100-1107-102

"as you requested." However, it wasn't until last week, when I finally sat down to read it, that I realized you had sent me a draft copy of the Reponsiveness Summary on the Quarry BULK WASTES, not on the Quarry WATER. Therefore I am writing once again to request a copy of the Responsiveness Summary on the Quarry Water as cited in the April 2, 1990, DOE letter. Or doesn't it exist?

As you know, according to the National Environmental Policy Act federal projects "which could significantly affect the human environment" must either be thoroughly analyzed through the Environmental Impact Statement process, or they must first have been analyzed to a lesser degree in an Environmental Assessment, followed by the issuance of a FONSI explaining why a full EIS was not required.

One of the criteria for determining if an EIS should be prepared is whether the project is controversial. To those of us who obtain our drinking water 10 miles downstream from the proposed discharge of an estimated 57 million gallons of PIT water, and 11 or 12 miles downstream from the discharge pipe for the estimated 3 million gallons of QUARRY water -- and who happen to have heard about the plans for these Weldon Spring waters -- the DOE "solutions" are indeed controversial, and worrisome.

The Coalition for the Environment outlined some of its concerns about the DOE's proposals for the Quarry water and bulk wastes in a June 18, 1990, letter to Robert Morby, Chief of the EPA's Region VII Superfund Branch, Waste Management Division. The Coalition asked that the EPA insist that the Department of Energy either prepare a full EIS on the Weldon Spring "interim" proposals -- complete with an interagency review and public participation -- "or at the very least [prepare] a true environmental assessment, as required by NEPA."

The Coalition also asked in its June 1990 letter for the EPA's assistance in procuring DOE funding for "the local governments immediately downstream from the Quarry water discharge pipe for independent monitoring of each batch of treated water before discharge."

Mr. Morby's 7-page-long August 13 response indicated that he shares the Coalition's interest but not its concerns.

Nevertheless concerns persist about the release of the "treated" Quarry water -- particularly now that it seems apparent the project is progressing for real. I learned recently that the DOE has started clearing land for a water treatment plant next to the Quarry, having received a Missouri Department of Natural Resources construction permit for the clearing. The last time I checked, a construction permit for the plant itself has not yet been issued.

(2) If the Department of Energy has performed any bench-scale laboratory tests on actual Quarry water, using the TECHNOLOGIES chosen for the Quarry water treatment plant, may I please have a copy of the results?

I would also appreciate receiving a copy of the results of any tests performed on the MONITORS that are to be used after the water has been treated, that is, when it is in the holding basin awaiting approval for its release to the river.

As of the August 16 public meeting, when I asked whether any such

laboratory tests had been performed, I was told that only a "coagulation test" had been. I wasn't certain from the answer whether that test included actual Quarry water.

I would like to know if any other bench-scale tests have been performed using any of the other proposed technologies on actual Quarry water samples -- in fact, on samples collected from any of the various depths or locations within the nine-acre Quarry, each one of which could present its own surprises. We have been asking for the results of such bench-scale tests since early 1989 when the Coalition for the Environment initiated its request to the State for additional environmental monitoring requirements in the DOE's Quarry water NPDES permit. As you know, most of the Coalition's requests were granted.

As I mentioned at the August 16 public meeting, several chemical engineers have told me that not only are such laboratory tests standard in industry, but that complex processes are also customarily tried out in a pilot plant, with scaled-down equipment, as well. As quoted in my August 16 testimony, "few full-scale systems have been built" for the removal of uranium from drinking water. (Amrican Water Works Ass'n Journal, July 1988) The Quarry water, contaminated with uranium and a combination of many other known and unknown radioactive, hazardous, and explosive (!) materials, should certainly qualify for such conservatism and caution. And especially when 1.4 million people live downstream.

Jim

(3) May I please have a copy of the procedures protocol which governed the hydrant tests performed last week in the Southeast Drainage creek? And may I also please have a copy, when available, of the results of the tests?

I learned from KTVI's Lisa Brown one morning last week, on September 25, that you were planning to perform some "hydrant tests" that afternoon and the next day -- releasing clean water into the contaminated Southeast Drainage creek to see if any of the radioactive contaminants became resuspended and were then collected by the flowing water.

(4) If the DOE has decided to add a monitor at the Missouri River where the Southeast Drainage enters, may I please have a copy of the related correspondence notifying the State of the change? Gene or Jim

Your response to the above requests for information will be greatly appreciated. I will be happy to pay for photocopying and postage.

Sincerely,

Kay

cc: Senators John Danforth and Christopher Bond
Representatives William Clay, Richard Gephardt, and Jack Buechner
Governor John Ashcroft
Mr. Robert Morby, Region VII, EPA