

POSITION PAPER

ENVIRONMENTAL DOCUMENTATION REQUIREMENTS
AND
REMEDICATION OF THE SOUTHEAST DRAINAGE

WELDON SPRING SITE REMEDIAL ACTION PROJECT

April 1991

SUMMARY

The southeast drainage is a watershed with intermittent flow that traverses the Weldon Spring Wildlife Area from the Weldon Spring Chemical Plant/Raffinate Pits (WSCP/WSRP) to the Missouri River. This drainage received process effluent during the operation of the Weldon Spring Chemical Plant and continues to receive surface water flow from the WSCP. As a result, above-background radioactivity levels have been observed in the water and sediments in the drainage. Past activity associated with the U.S. Army Ordnance Works is a probable source of the nitroaromatic contamination evident in the lower portion of the drainage. Due to this contamination, remedial decisions related to the southeast drainage have been discussed in the Draft Feasibility Study-Environmental Impact Statement for the WSCP.

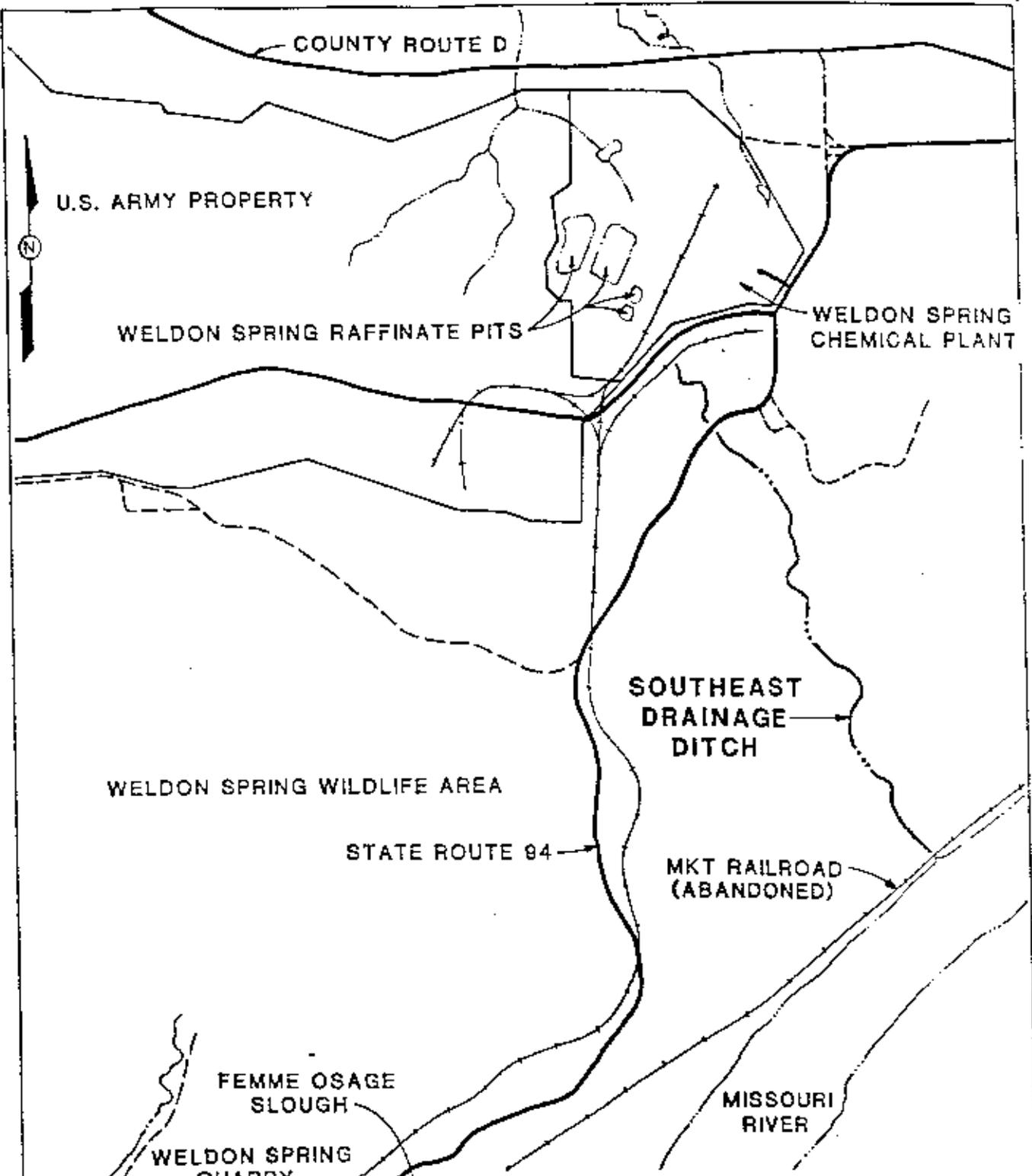
This position paper proposes an alternative decision-making strategy for remedial actions in the southeast drainage. The decision for remediation of this area should be deferred until most of the remedial actions at the WSCP have been completed. Reasons for this recommendation are as follows:

Characterization information on the southeast drainage is insufficient to permit an accurate determination of the quantity of material containing contaminant levels above the site cleanup standard.

The environmental impacts on this watershed that would be caused by remediation activities have not been quantified. At minimum, severe short-term ecological damage would result from removal actions in this watershed. The relationship between ecological damage and remedial activities implies that establishment of supplemental cleanup criteria for this area would likely result in less environmental impact.

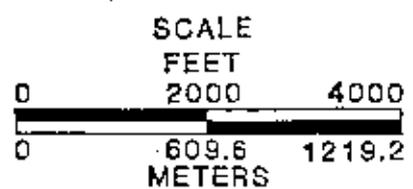
Above-background levels of radionuclides will continue to be released into this drainage through surface water until all source areas in the WSCP are remediated. The source or sources of nitroaromatic contaminants must also be identified prior to a final remedial decision. Therefore, the most logical schedule for any remediation is after removal of the source areas.

For these reasons, it is recommended that the remedial decisions relating to the southeast drainage be evaluated after the WSCP remediation. Documentation for these decisions would be accomplished in the form of an Engineering Evaluation/Cost Analysis. Additional characterization, establishment of supplemental cleanup standards, and evaluation of environmental impacts would be accomplished during remediation of the WSCP. Actual remediation could be performed after removal of the contaminant source areas.



SOUTHEAST DRAINAGE DITCH LOCATION

FIGURE 1



REPORT NO.			DRAWING NO.: A/VP/015/0391		
ORIGINATOR: KRW	DRAWN BY: GLN	DATE: 3/91			

to the lower portions of the drainage. Therefore, the most logical time to conduct remedial actions in the southeast drainage is after removal of upstream source areas.

RECOMMENDATION

For the reasons stated above, it is recommended the remedial decisions relating to the southeast drainage be evaluated separately from the site FS-EIS. This will enable characterization to continue during site remediation and provide the opportunity to make a clear assessment of potential ecological damage prior to a remedial decision. This will also allow the Department of the Army to complete additional characterization to identify source areas of nitroaromatic contamination. Deferring these activities will not affect the schedule for remediation since the optimum time for remediation of this drainage is after the removal of upstream source areas.

Documentation for this decision would be in the form of an Engineering Evaluation/Cost Analysis (EE/CA). To satisfy both NEPA and CERCLA documentation requirements, this document will include characterization information, a risk assessment, and an assessment of ecological impacts.

ENGINEERS
AND
CONSTRUCTORS



MK-FERGUSON COMPANY

A MORRISON KNUDSEN COMPANY

WELDON SPRING REMEDIAL ACTION PROJECT
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April 9, 1991

U. S. Department of Energy
Weldon Spring Site
Remedial Action Project
ATTN: Mr. Stephen H. McCracken
Project Manager
7295 Highway 94 South
St. Charles, MO 63303

SUBJECT: Contract No. DE-AC05-86OR21548
POSITION PAPER REGARDING ENVIRONMENTAL
DOCUMENTATION AND REMEDIATION OF THE SOUTHEAST
DRAINAGE

Dear Mr. McCracken:

A position paper regarding environmental documentation and remediation of the southeast drainage is enclosed. This paper supports the decision to provide environmental documentation of remedial decisions related to the southeast drainage in a separate Engineering Evaluation/Cost Analysis (EE/CA) instead of the site FS. This move will allow the DOE to assess the ecological impacts of remedial activities on this drainage. We will then be able to balance remedial requirements with environmental impacts. Supplemental cleanup criteria may be required in order to achieve this balance.

The paper has been reviewed by ANL, and their input has been incorporated.

DRAFT TRANSMITTAL LETTER

U.S. Environmental Protection Agency
ATTN: Mr. Dan Wall
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Dear Mr Wall:

**POSITION PAPER REGARDING ENVIRONMENTAL DOCUMENTATION AND
REMEDICATION OF THE SOUTHEAST DRAINAGE**

A position paper on environmental documentation and remediation of the Weldon Spring site southeast drainage is enclosed for your review. This paper supports the decision to move remedial decisions related to the southeast drainage from the site FS to a separate Engineering Evaluation/Cost Analysis (EE/CA). This move will allow the DOE to assess the ecological impacts of remedial activities on this drainage. The PRC will then be able to balance remedial requirements with environmental impacts. Supplemental cleanup criteria may be required in order to achieve this balance. This area could be remediated after upstream source areas are removed.

Please consider this proposal and contact this office if you have any questions or concerns.

Sincerely,

Stephen H. McCracken
Project Manager
Weldon Spring Site
Remedial Action Project

Enclosure:
As stated