

WELDON SPRING CITIZENS COMMISSION

100 North Third Street - Room 107

St. Charles, Missouri 63301

June 14, 1999

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

Dear Mr. McCracken:

This letter is in response to your solicited request for comment and review on the *Stewardship Plan for the Weldon Spring Site, Revision A*. The Commission appreciates the opportunity to offer whatever guidance and perspective we can in the development of a working document that will hopefully outline the responsible institutions, their respective roles, and the activities necessary for the long-term protection of human health and the environment. We recognize that this document is merely a framework for further development and is intended as a collaborative enterprise. It is in that spirit that we offer our initial comments in rather broad fashion with the full expectation that as the conceptual directions and objectives are more clearly established the details of implementation can more realistically be addressed.

As an overarching theme, the Commission envisions the stewardship plan as a sort of master plan that integrates other associated plans/activities such as contingency plans, monitoring plans, and maintenance plans. In fact, you may want to consider adding "master" to the plans title to drive home this conceptual distinction. Following along this theme, one of the principle thrusts of this plan must be to ensure that all of the subordinate plans mesh seamlessly with one another as opposed to managing and tracking multiple independent plans. There are obvious advantages to a more consolidated approach (e.g. placing similar plans on similar review and evaluation schedules).

Our specific comments are presented in chronological order with respect to the various sections detailed in the plan.

1.1.2 Long-term Effectiveness

The incorporation of the Quarry Groundwater Operable Unit with the Chemical Plant into a single plan makes sense from both an operational and administrative standpoint.

The last paragraph alludes to the *development* of contingency plans. To be clear, the Commission understands that contingency plans are currently in the works, however, these contingency plans need to *be essentially completed and incorporated* into the final stewardship plan. The stewardship plan cannot be considered complete until the accompanying contingency plans, maintenance plans, and monitoring plans are finalized and meshed with the other components of the plan to provide a self-supporting system of checks and balances.

### 1.1.3 Adaptability

Building flexibility into the stewardship plan is essential to its practical functioning in the foreseeable future. Because adaptability is critical to the long-term effectiveness of the plan, this section requires much more detail in identifying how the process of change will come about. The accompanying figure 1-1 really only addresses the documentation aspect and only in a broad conceptual way. There remain questions of who will be involved, how they will be kept informed, and what effect the trigger levels in contingency plans might have on the frequency of the evaluation process. In summary, this section of the plan needs to provide sufficient detail so that readers can understand *how plan changes will actually occur*.

A related issue involves the frequency of review of the stewardship plan itself including any of its associated subordinate programs. Will it be annually after a review of the annual monitoring or possibly tied to the five-year review process?

## 2.1 Authority and Funding

Because long-term implementation of the stewardship plan is contingent on supporting funding, the issue of funding is a critical issue. Because appropriation of funds is a quasi-political process, what information will be available to stakeholders *before* budget requests for funding are sent forth for authorization by the agency?

## 2.2 Stewards

Table 2-1 should include a local presence in the oversight category. At a minimum, the county government should be represented. An organized public presence is also advisable. The exclusive use of public meetings does not translate as a effective public participation. Additionally, public access to information in a public library hardly qualifies as a means for providing or promoting public awareness. The complex technical issues associated with the project suggest that an organized public function is best suited to keep a vigilant eye on oversight issues and provide a balancing influence between the formal sub-governmental institutions involved with this project.

## 2.3 Operations

### Enforcement

What happens if ARAR's or trigger levels are exceeded? These details need to be provided.

### Inspections and Re-evaluation

The plan needs to provide details rather than state "periodic". How frequently will the plan be re-evaluated and possibly revised?

### Public Participation

This section will require much more than specification of yearly reports and five-year reviews. The contamination resides in the community, not in isolation. Changes in the community may require re-evaluation. How will Grand Junction be kept informed of relevant community developments?

It has been recommended earlier that the county government and some form of organized citizen involvement be included as oversight stewards. This needs to be included in this section.

## 2.4 Institutional and Physical Controls

The following issues need to be addressed for institutional controls in the Plan:

- A description of the objectives for each control.
- Types of controls to be used in each area (framework in Section 3 is a good start).
- Details on implementation of each control.
- How controls will be maintained.
- A description of the legal mechanism for each type of control.

## 2.5 Information Systems

This section requires much more refinement in establishing a data management plan for future generations. As a first step, the Commission recommends that findings from the report issued by ICF Kaiser, *Managing Data for Long-Term Stewardship - 3/98*, be used to benchmark the sites current data collection and archiving practices.

Some important issues that must be evaluated include:

- What types of data are needed to support future long-term stewardship activities?
- Can existing data be screened to reduce volume?
- Is data archived in all databases consistently indexed in such a manner to make it accessible or searchable for future users?

- Will software be available to manage or access the data in the future?

Some of the relevant findings of the above referenced study indicate that information that has stewardship value is being lost, destroyed, or maintained in formats that may not be useful to stewards in the future. Also, future users may not know where or how to search for all relevant information creating delays in action or the potential for unnecessary risk. These types of concerns need to be addressed in the information systems section of the stewardship plan.

A copy of the referenced report is available from the DOE-EM Office of Policy, Planning, and Budget.

### 3.2 Weldon Spring Quarry

Does DOE intend to keep ownership of the quarry? Will there be residual contamination near the north rim left in place?

### 3.3 Quarry Area Groundwater

Institutional controls are identified as a means to limit access to groundwater north of the slough. How is the referenced deed restriction supposed to be enforced and by whom? What exactly are the terms of this agreement?

Because the long-term monitoring established for this operable unit is subject to periodic evaluation, review, and possible action, the Well Field Contingency Plan needs to be incorporated into this section.

### 3.5 Burgermeister Spring

Although DOE has an agreement that allows access for post-closure monitoring, a contingency plan is required that discusses plans for actions if contaminant concentrations exceed certain levels. These trigger levels need to be contaminant specific and actions described, as well as those parties responsible, for implementation.

In summary, the Commission appreciates the opportunity to work with DOE and the other stakeholders in the development of this important document. The Commission has been collecting, studying, and analyzing the subject of stewardship for well over 9 months in anticipation of the final decisions related to the closure of this project. The knowledge gained has convinced us that the notion of stewardship is still largely in the

conceptual phase and application experience in short supply. This affords both opportunities as well as challenges. We are confident that the good first scoping effort related in the draft stewardship plan can be built upon into a first rate document that will ensure the long-term health of the community and the surrounding environment.

Sincerely,

*Weldon Spring Citizens Commission*

Weldon Spring Citizens Commission

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