

April 24, 1997

TO: Karen Reed, Weldon Spring Site (WSS)

FROM: Andrea W. Campbell, ORO, Technical Support Division

SUBJECT: **Review of Preliminary Draft Feasibility Study (FS) for Remedial Action for the Quarry Residuals Operable Unit at the Weldon Spring Site (DOE/OR/21548-595)**

The following comments on the subject document are provided to you in response to a request for review from Stephen H. McCracken, WSS Remedial Action Project Manager, in a letter dated April 16, 1997. To determine whether the FS incorporates National Environmental Policy Act (NEPA) values, my review focused on elements of the report that provide descriptive information about the environment that would be affected by the proposed remediation and potential adverse impacts. If you have any questions, please call me on (423) 576-9578 or email me at qna@ornl.gov.

P. 1-5, Figure 1.2: Unnamed is misspelled.

P. 1-8, para. 2: Indicate that all St. Charles County monitoring and production wells are screened in the alluvium (as stated later in the report on p. 4-2), which is the aquifer affected by groundwater flow (and contaminants) from the quarry site.

P. 1-9, para. 3: The sources of information on threatened and endangered species are outdated (1988 and 1990). Correspondence with the regional office of the U.S. Fish and Wildlife Service is recommended.

P. 1-10, para. 1: After "A brief summary" add the words "of information provided in the RI".

P. 1-10, para. 3: State the significance of concentrations at twice background or greater, and indicate if this is a regulatory criterion for determining the need for remedial action (for the benefit of a lay reader such as I and/or someone who is only generally acquainted with CERCLA and environmental restoration actions).

P. 1-13, para. 1: Define "hazard index" for the lay reader, and explain what is considered acceptable.

P. 1-15, para. 1-15: Provide a reference for the EPA acceptable risk range.

P. 1-16, Table 1.2: Add EPA risk range values as a column in the table to enable comparison.

P. 1-17, para. 1, line 4: Delete the word "modeled", as it is repetitive. This sentence states that there are no risks to terrestrial wildlife receptors, yet the following sentence states that the muskrat is subject to high risk and dismisses the muskrat's risk because of "conservative modeling assumptions". Wouldn't it be best to just delete the second sentence because of the contradiction?

P. 4-2, para. 2, line 9: After "19" add the words "DOE wells" for clarity.

P. 4-2, general comment: Has DOE and/or St. Charles County considered quarterly sampling in random households supplied with drinking water by the St. Charles well field? Such testing may already be conducted, as EPA regulations require sampling and analysis of drinking water for constituents listed in *Safe Drinking Water Regulations*. If the municipal supplier does not analyze in this manner, it may be prudent to test these households quarterly for contaminants known to be present in the groundwater flowing from the quarry.

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"We are too soon old and too late smart."
-Pennsylvania Dutch
Proverb