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Weldon Springs Citizen Commission

100 N. Third Street
St. Charles, MO. 63301

September 17, 1996

Mr. Jerry Van Fossen
U.S. Department of Energy
7295 Highway 94 South
St. Charles, MO 63304

Dear Mr. Van Fossen,

This letter is to serve as public comment from the Weldon Springs Citizen Commission and addresses the proposed removal action at the Southeast drainage described in the most recent Engineering Evaluation/Cost Analysis (EE/CA 8/96). Our preference for the alternative removal plan 2.1 detailed in the 6/96 EE/CA was conveyed to you in an earlier correspondence (GAH to JVF 7/11/96). Since then, Commission members have had further discussions with Federal and State regulatory representatives and allowed these parties to clarify their respective positions to the alternative proposals put forth in the latest EE/CA document. The Commission's position has not changed, and we remain convinced that the measures detailed in alternative 2.1 provide the best balance of public health and environmental protection considerations. Our reasons for this position are detailed below.

First, there appears to be disagreement on the issue of the future land use of the property in question. This is a critical point since it provides the basis for subsequent risk modeling to estimate acceptable risk based cleanup levels. The EPA and Missouri Department of Conservation tend to accept that the current use, recreational, provides a reasonable anticipated land use scenario for the foreseeable future. The Missouri Department of Natural Resources (MDNR) is concerned that pressure from continued urban development in the county will eventually result in the S.E. drainage property being used for residential purposes.

If the property in question was on private land then the potential for residential development might conceivably pose a future risk management problem. This is not the case since the State owns the S.E. drainage property and is under complete control of its ultimate fate. The State is responsible for managing health risks to the public and can do so through administratively controlling the land use. This can be accomplished through a deed restriction on the property to ensure that the land use remains consistent with protective risk levels detailed in alternative 2.1.

Second, the MDNR has voiced concern as to the adequacy of the characterization of contamination on the S.E. drainage. Although no specific evidence of this has been presented to the Commission, it remains an uncertainty that, we think, must be considered in the final cleanup strategy. It is conceivable that unknown amounts of contamination may have been missed due to factors such as migration. If this possibility exists, it would strengthen the case for restricting the final land use to recreational. Why expend additional public funds to cleanup a piece of property to "unrestricted levels" when there remains doubt as to the quality of the characterization? It seems that the most reasonable strategy, given this expressed concern, is to adopt the risk based cleanup levels proposed in alternative 2.1, target the cleanup where it can be accomplished in an ecologically sound manner, and restrict the land use to its' current use.

Third, we would like to express our view that the recreational model (Hunter scenario) while theoretically less conservative than a residential model (child scenario), is in a very practical sense, a very conservative model when one considers the current use of this property. The assumptions on which this model is based already add a sizable safety margin to the risk levels reported for this model. Therefore, we find arguments regarding cleanup levels that are reduced to differences between hypothetical cancer risks of 1 in 100,000 and 1 in 1,000, 000 to be largely academic. The practical risks, we believe, are much lower based upon our understanding of the assumptions of the models being used.

The current excess cancer rates as calculated in the Hunter scenario indicate that in its current condition the S.E. drainage shows marginal increased health risks. The *current* reported risks to hunters or hikers from exposure to contaminated sediment, chemical carcinogens, and surface water range from 2 in 100,000 to 2 in 10,000,000 (any and all segments of the drainage). The Missouri Department of Health recommends that a lifetime risk of cancer not exceed 1 in 100,000 while the MDNR recommends 1 in 1,000,000. Therefore, there is at least a theoretical argument for some form of

remediation in some segments of the drainage to reduce the levels of risk to 1 in 100,000. The proposed alternative 2.1 meets that risk criterion.

Fourth, the EPA has expressed "strong misgivings" concerning the ecological damage that might occur using conventional construction techniques. Given the marginal (Hunter scenario) risk based argument for remediation within the drainage and given the current recreational use of the property, we think ecological considerations should be given equal weight in the cleanup strategy. Within this context, we are satisfied that the cleanup techniques and the overall cleanup strategy detailed in alternative 2.1 strikes a reasonable balance between lowering potential health risks to the public while minimizing environmental damage.

In summary, the alternative 2.1 proposed in the 8/96 EE/CA provides a selective approach to the removal of contaminated material in all four sections of the drainage and will effectively accomplish the dual objectives of lowering potential health risks to the public while minimizing environmental damage. We appreciate the opportunity to offer a community perspective this ongoing remediation effort.

Sincerely,

Glenn A. Hachey

Glenn A. Hachey
Chairman

cc: Karen Reed - DOE
Pamela Thompson - DOE
Steve McCracken - DOE
Jim Garr - MDC
Robert Geller - MDNR
John Young - MDNR
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Martha Windsor - MDNR
Dan Wall - EPA

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