GWOU ADMINISTRATIVE RECORD
SECTION TITLE:
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MISSOURI DEPARTMENT OF CONSERVATION

Headquarters
2901 West Truman Boulevard, P.O. Box 180, Jefferson City, Missouri 65102-0180
Telephone: 573/751-4115 ▲ Missouri Relay Center: 1-800-735-2966 (TDD)

JOHN D. ROSKENS, Director

August 25, 2003

Larry V. Erickson
DOE Unit Chief, Federal Facilities Section
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102-0176

Dear Mr. Erickson,

Thank you for compiling state response to the Proposed Plan and Supporting Evaluation for the Proposed Plan for Final Remedial Action for the Groundwater Operable Unit at the Chemical Plant Area of the Weldon Spring Site, Weldon Spring, Missouri. We have reviewed the documents and offer the following comments.

We are disappointed that the Proposed Plan and its Supporting Evaluation did not address many of the specific and constructive comments submitted in the April 31, 2003, letter from me to Pam Thompson of the Department of Energy. In spite of this setback, we continue to strive for an agreeable solution, in coordination with all state and federal agencies.

The Missouri Department of Conservation supports implementing Institutional Controls (ICs) to safeguard human health by limiting exposure to groundwater. However, it is difficult to anticipate the demand for groundwater use that could occur in the future, and the resulting impact that restrictions will have on Conservation Department property. It is essential to aggressively monitor contamination levels according to specifications recommended by the Missouri Department of Natural Resources. Frequent and thorough monitoring will measure the effectiveness of Monitored Natural Attenuation (MNA). If MNA is successful, restrictions on groundwater use could be reduced in the future.

The Conservation Department supports the development of informational brochures that will educate the public about the current groundwater contamination issue without discouraging their use and enjoyment of these lands. A brochure should be developed with input from all state and federal agencies involved that can be made available at the August A. Busch Memorial Conservation Area Office and the Weldon Spring Site Interpretive Center.

COMMISSION

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The Missouri Department of Conservation strongly supports agreeing to the details of these and other Institutional Controls before the Record of Decision is signed. Only by having ICs firmly in place will the health and safety of the public be assured. We are committed to working with the Department of Energy to finalize the ICs that will affect Conservation Department property.

We respectfully request that these comments, along with others specified in our April 31, 2003, letter, be addressed and incorporated into the final plan for groundwater contamination remediation. Attached for your record is the statement read on behalf of the Department of Conservation at the August 13, 2003, public meeting at Weldon Spring.

Thank you for the opportunity to comment and your serious consideration of our concerns.

Sincerely,

John Hoskins

JOHN D. HOSKINS
DIRECTOR

Attachment
c: Senator Christopher S. Bond
Senator Jim Talent
Representative Todd Akin
Representative Kenny Hulshof
Missouri Conservation Commission
Weldon Spring Citizens Commission
Steve Mahfood, Department of Natural Resources
Gale Carlson, Department of Health and Human Services
Cristy Gallagher, State of Missouri Washington Office

Missouri Department of Conservation Statement
Weldon Spring Public Meeting
August 13, 2003

"The public entrusts to the Missouri Department of Conservation the care and management of the land and its resources surrounding the Weldon Spring Site Remedial Action Project (WSSRAP). These public areas, known as the August A. Busch Memorial Conservation Area and the Weldon Spring Conservation Area, are enjoyed by half a million visitors per year. As population and development continue to grow in St. Charles and surrounding counties, it is expected that public use of these conservation areas will also grow. We take our responsibility to ensure the safety and enjoyment of these visitors very seriously.

Groundwater underlying these two areas is an essential component of their resource health. Contamination that lasts for 100, 500, or 1,000 or more years compromises our ability to use the natural resources in a way that ensures our visitors' safety and health. We are well aware of calculations that show little risk at anticipated exposure levels. However, we are also aware that such calculations may change as more is learned about specific contaminants, and that conditions over time may increase exposure levels. All these factors require that groundwater contaminants be monitored and treated to the extent technology makes possible.

We would consider Monitored Natural Attenuation an acceptable alternative under the following circumstances:

- If the state and federal agencies agree that groundwater remediation is not technically feasible at this time.
- If the state and federal agencies agree to revisit the issue as new technologies become available regardless of changes in exposure risks.
- If the state and federal agencies collect data that demonstrate to our agency and the public that the contamination is not spreading or impacting ecosystems on Department of Conservation property.

Additionally, we question the efficacy of several trigger points and contingency actions in the proposed plan and supporting evaluation, and request the following monitoring practices be adopted:

- When TCE levels exceed drinking water standards (5 micrograms per liter) in any unweathered zone well, the ICO hotspot treatment or alternative remedial action should be initiated regardless of the TCE concentrations in the plume. A trigger point of 20 ug/l, as indicated in

your document, is unacceptable, and remedial action should not be dependent on contaminant levels in the plume.

- Similarly, at Burgermeister Spring, active remedial alternatives should be implemented when TCE levels reach 5 ug/l, regardless of concentrations in the plume.
- Fish tissue sampling should be conducted annually to inform the public about the safety of fish consumption from Department of Conservation lakes and the effectiveness of Monitored Natural Attenuation.
- At Burgermeister Spring, the trigger point for uranium should be 100 pico-Curies per liter, not 300 pCi/l as your document indicates.
- Additional monitoring wells whose number and placement coincide with recommendations made by the Missouri Department of Natural Resources should be created to determine the current vertical and horizontal extent of contamination, and to confirm plume locations and attenuation.

We would like to emphasize the need to aggressively monitor groundwater contamination. By allowing contaminated groundwater to continue to spread to this high use public area, the Department of Energy is effectively removing the value of the groundwater resource from Conservation Department property."