GWOU ADMINISTRATIVE RECORD
SECTION TITLE:
GW-400-402-1.04

88186

STATE OF MISSOURI
Mel Carnahan, Governor • Stephen M. Mahfood, Director
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF THE DIRECTOR
P.O. Box 176 Jefferson City, MO 65102-0176

CERTIFIED MAIL Z 062 474 263
RETURN RECEIPT REQUESTED

September 27, 2000

Mr. Steve McCracken, Project Manager
United States Department of Energy
Weldon Spring Remedial Action Project
7295 Highway 94 South
Weldon Spring, MO 63304

RE: DRAFT INTERIM RECORD OF DECISION FOR REMEDIAL ACTION FOR THE GROUNDWATER OPERABLE UNIT AT THE CHEMICAL PLANT AREA OF THE WELDON SPRING SITE (September 2000)

Dear Mr. McCracken:

Thank you for the opportunity to comment on the Draft Interim Record of Decision (IROD) developed to address trichloroethylene (TCE) contaminated groundwater at the Weldon Spring Chemical Plant site. Several members of my staff and other support agencies have reviewed this document and have developed two paragraphs to be inserted into the IROD indicating conditional state concurrence with the decision. We suggest the following language be inserted on page iii in place of "The State of Missouri...:"

> The State of Missouri concurs with the proposed remedial action to implement treatment of TCE contaminated groundwater by a chemical oxidation process. We agree with DOE's proposal to design the system to meet the five parts per billion standard for TCE. Due to complex site conditions and the innovative nature of the treatment process, actual field performance may not meet design specifications. For this reason, the state believes a performance goal must be established. We recommend that chemical application should continue beyond design specifications for as long as the application is effectively reducing the TCE concentration or until the five parts per billion standard is achieved.

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Although the State of Missouri agrees with this proposed remedial action to treat TCE, for the record, we disagree with some of the positions and statements presented in this Interim ROD. Consideration of matters beyond those specifically pertinent to the narrow issue of TCE treatment are outside the scope of this document, including issues related to institutional controls. The State of Missouri expects to revisit these issues when a final Groundwater Operable Unit ROD is developed and will reserve comment until that time.

I have asked my staff to develop specific comments on the entire IROD. Due to the very short time frame for review of this document, these specific comments will be transmitted under separate cover. If you have any questions, please contact me at (573) 751-4732 or Mr. Robert Geller at (573) 751-3907.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES

for Stephen Mahfood
Director

SM:bdp