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MISSOURI DEPARTMENT OF CONSERVATION

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JERRY M. CONLEY, Director

April 14, 1999

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

Dear Mr. Erickson,

Thank you for providing a copy of the Draft Supplement To the Final Feasibility Study For the Chemical Plant Groundwater Operable Unit for our review.

The Missouri Department of Conservation relies heavily on your agency's expertise in technical matters concerning contaminants in groundwater. We very much appreciate your careful review of documents concerning the Weldon Spring Site Remedial Action Project and your continued concern for achieving the best solutions to the complex contaminant problems that impact us.

As noted in my letter of April 3, 1998, to Mr. McCracken, the Missouri Department of Conservation is concerned about movement of contaminants off the Weldon Spring Chemical Plant site onto our properties, the August A. Busch Memorial Conservation Area and the Weldon Spring Conservation Area. The draft Supplement notes that about 80% of the effective recharge to the shallow groundwater system beneath the chemical plant area discharges at Burgermeister Spring. Another fraction discharges at other points on our property. Contaminant concentrations at Burgermeister Spring vary from one year to the next. Concentrations of uranium and 2,6-DNT increased from 1997 to 1998. Contaminant levels in some monitoring wells on our property near the Chemical Plant site have concentrations of contaminants well above Preliminary Remediation Goals.

Our agency favors active remediation approaches over those that rely heavily on institutional control of the use of our lands. We are not unwilling to provide some level of institutional control, however expectations concerning this have not been clearly outlined. We own more than 14,000 acres surrounding the plant site. Restrictions impact property value and our resource management options. The examples of deed restrictions mentioned (p.34) include "...prohibiting residential or agricultural use. Drilling for mineral, water, or other purposes would also be prohibited." Would such restrictions apply only to removal and use of groundwater? How many acres would need to be restricted? Why would it be necessary to restrict drilling for

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COMMISSION

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