Department of Energy
Oak Ridge Operations
Weldon Spring Site
Remedial Action Project Office
Route 2, Highway 94 South
St. Charles, Missouri 63303

February 9, 1989

Ms. Nancy Becker
Eastern District Commissioner
County Administration Building
118 North Second Street
St. Charles, Missouri 63301

Dear Ms. Becker:

Enclosed are responses to the four(4) items you addressed in your letter dated December 8, 1988. As requested in your letter your statement will be included in the meeting record.

It is unfortunate you were under the impression you needed to schedule in advance to speak at our December public meeting. The procedure followed at the meeting, like all meetings, is that after formal presentations and a break, questions posed on the 3 x 5 cards are answered and then the floor is opened up for any questions and/or comments. It is important that all who have a question or a comment have an opportunity to input into the process.

Thank you for your participation in the Weldon Spring Project, your interest is appreciated.

Sincerely,

R.R. Nelson
Project Manager
Weldon Spring Site
Remedial Action Project

Enclosure:
As stated

cc w/enclosure:
D. Bedan, MDNR
D. Wall, USEPA

RESPONSE TO COMMENTS RAISED BY
NANCY BECKER, EASTERN DISTRICT COMMISSIONER
CONCERNING THE RI/FS-EIS WORK PLAN

1. The Work Plan has been prepared consistent with the requirements of the National Environmental Policy Act (NEPA) as well as the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the latter commonly referred to as Superfund. The procedure used to develop alternatives for analysis in the Remedial Investigation/Feasibility Study - Environmental Impact Statement (RI/FS-EIS) are described in Section 3.8.3 of the Work Plan. This procedure, which has been reviewed by the U.S. Environmental Protection Agency, Region VII and the Missouri Department of Natural Resources, is consistent with the requirements of NEPA and CERCLA. No decision on the location of waste disposal has been made at this time. That decision will result from the analyses contained in the RI/FS-EIS.

   The DOE is not intending to institute detailed characterization activities of off site areas for disposal of the Weldon Spring wastes at this time. However, such a detailed assessment would be undertaken in the future, as appropriate, pending the results of site characterization activities and the screening of alternatives to be conducted during the RI/FS-EIS process, as described in Sections B.1.5 and B.1.6 of the Work Plan.

2. The DOE has no plans to move additional wastes to the Weldon Spring site for disposal, as stated in Section B.5.2 of the Work Plan.

   As noted in the response to item number 1 no decision on the location of waste disposal has been made. That decision will result from the analyses contained in the RI/FS-EIS. That analyses will assess the impacts associated with loading, transporting, and disposing of the wastes at an off site facility within 160km (100 mi) of the Weldon Spring site. This evaluation will be undertaken as part of the analysis of preliminary alternatives, which also considers such issues as implementability and cost. If the off site disposal alternative is retained after the screening process, detailed analysis of this alternative will be performed.

3. The DOE and its contractors are currently developing the environmental compliance documentation for removal of the bulk wastes from the quarry. Health and safety of the workers and the public in general is our first consideration as we prepare this documentation. Your comments on this issue are appreciated.

4. Operations during the remedial action work will be conducted in a manner that will ensure the health and safety of the students and staff of Francis Howell High School; therefore, making it unnecessary to relocate the school. The Missouri Department of Health (DOH) is in agreement with DOE that proper planning, adequate work procedures and practices, and a reliable monitoring program to verify compliance with exposure guidelines will ensure the health and safety of the public. The DOE and the Missouri DOH do not believe that baseline medical exams would be beneficial. An appropriate physical which would provide an adequate baseline for evaluating the health effects associated with the radiological levels associated with this project does not exist. That coupled with the long latency period for health effects from radiation exposure make medical exams impractical. Medical exams would not ensure the health or safety nor would they provide an early warning. Again, proper planning, adequate work procedures and practices, and reliable monitoring are more important in protecting the health and safety of the public. The DOE is committed to a safe environment for the public during the clean up.

ST. CHARLES COUNTY COMMISSION

COUNTY ADMINISTRATION BUILDING

118 NO. SECOND STREET ST. CHARLES, MISSOURI 63301

947-2603

JANE C. SCHMIDT
Western District Commissioner

GERALD (JERRY) OHLMS
Presiding Commissioner

NANCY C. BECKER
Eastern District Commissioner

December 6, 1988

DEPARTMENT OF ENERGY

ENVIRONMENTAL PROTECTION AGENCY

I am pleased to have the opportunity to participate in this public review of the proposed Work Plan for the environmental studies to be undertaken prior to deciding the best alternative for the cleanup of Weldon Spring. The cleanup task you have undertaken -- as employees and contractors of the Department of Energy, the Environmental Protection Agency and the Missouri Department of Natural Resources -- is massive in volume, and to us, as residents of St. Charles County and Metropolitan St. Louis, it is massive in importance. My goal, as an elected official of St. Charles County, is to make certain that the challenge of cleaning up Weldon Spring is resolved in the manner that is the safest. That may not be the cheapest or -- politically -- the easiest.

I have a few specific comments this evening about the proposed environmental impact study work plan. Some of what I am concerned about is what you are <u>not</u> planning to study.

1. First, I would like to state most emphatically that I do not believe that the Work Plan as proposed adequately addresses the <u>full range of alternatives</u>

for the cleanup of Weldon Spring, as required by the Superfund and National Environmental Policy acts. You seem already to have made the decision to keep the contaminated materials at the Weldon Spring site without examining the alternative of finding a location away from the site -- and away from St. Charles County. You seem to have decided already just to study which location within the Weldon Spring area you will choose -- and which kind of technical fix -- that is, above grade, in a remodeled pit, or whatever. Many people, including myself, believe all of Missouri's radioactive waste should be consolidated at one location -- for example, perhaps in land contiguous to the Callaway nuclear power plant in the center of the state. Part of the 6500 extra acres owned by Union Electric and not used for the power plant could be purchased or condemned by the federal government, for above-grade storage of the St. Charles and St. Louis wastes that were dumped in the 1940s, 50s, and 60s. In addition, since there may be no other location for the radioactive wastes from the Callaway plant itself, they, too, may have to be stored near the Callaway plant. On pages 185 and 186 of the Work Plan, you announce that you will not initiate any off-site characterization studies -- that is, away from Weldon Spring. I believe that decision is premature and unwarranted.

2. Second, as a related concern: If it were to be decided that land within the 227-acre main Weldon Spring tract were to be dedicated as a permanent radioactive waste storage site, what wastes from outside of St. Charles might follow? The statement on page 174 that the DOE does not plan to bring wastes to Weldon Spring from the four major St. Louis City and County radioactive sites, and their vicinity properties, may reflect accurately the intentions today, but that promise may be unrealistic. The DOE's proposal for the St. Louis wastes has been repeatedly rejected by St. Louis officials. The City of St. Louis Board of Aldermen, and the St. Louis County Council and Municipal League have voted unanimously to seek Congressional action directing the DOE to remove the wastes and to find a different site away from St. Louis. They do not want to transfer 82 acres at the Airport to the DOE, as

proposed by the DOE. A few elected officials on the St. Louis side of the Missouri River are already proposing that all the Mallinchrodt wastes should be consolidated at Weldon Spring. If the DOE were to proceed with its St. Charles bunker, the threat that St. Louis's one-million cubic yards would be dumped here, too, becomes all the more likely. Once again, the alternative of consolidating all the Missouri wastes on land adjacent to the Callaway plant seems to be the safest, most responsible alternative. The wastes will have to be excavated from all the sites -- and will have to be moved by truck somewhere for disposal. St. Charles County's population is the fastest growing in Missouri. Furthermore, the Weldon Spring site is only nine miles upwind and upriver from St. Louis County. A site or sites away from Metropolitan St. Louis warrants your serious consideration. I do not believe you have the authority legally to abandon that alternative at this time.

3. Third, I would like to express my concerns about any Interim Remedial Action work being considered for the Quarry. I believe that plastic sheeting or other temporary enclosure structure should be installed before any excavation begins of the Quarry's bulk wastes. I also believe the work should be performed by remotely controlled equipment in order to keep workers from being exposed to the unpredictably high levels of penetrating radiation present within the Quarry -- and to keep them away from a possible accidental explosion of the TNT and DNT wastes in the Quarry. I also think the waste should be containerized for transport and during interim storage. This would reduce the exposure of workers and the public at the time when transport for final disposal is undertaken. Containerization also would reduce the dispersal of radioactive material during interim storage.

4. Last but not least, I would like to request that the students and staff at the Francis Howell High School be provided school space away from the Weldon Spring chemical plant area during the remedial action work. I also request that a baseline health study be initiated.

Again, I appreciate the opportunity to make these comments.

Eastern District Comm.
Nancy C. Becker