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

February 29, 1988

Ms. B. Katherine Biggs, Chief
Environmental Review Section
U. S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Dear Ms. Biggs:

WELDON SPRING QUARRY WASTE REMOVAL

Subsequent to the U. S. Environmental Protection Agency (USEPA) and U. S. Department of Energy (USDOE) meeting of January 7, 1988, the USDOE has reviewed current and proposed criteria related to removal actions and believes that removal of contaminated material from the Quarry, with transport of the material to the Weldon Spring Chemical Plant area, should be performed as a removal action. The rationale for this decision is largely based on information contained in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). Section 300.65(b)(2) of the NCP, and Section 300.415(b)(2) of the proposed revisions to the NCP, contain nearly identical guidance. They each contain eight (8) factors for determining the appropriateness of a removal action. Of these, the following are considered relevant to the proposed removal action at the Weldon Spring Quarry. (Underlined wording is contained in the proposed NCP, but not the existing NCP. Wording in parenthesis is contained in the existing NCP, but not the proposed NCP):

(i) Actual or potential exposure to <u>nearby human populations, animals, or the food chain from</u> hazardous substances or pollutants or contaminants (by nearby populations, animals, or food chain);

(ii) Actual or potential contamination of drinking water supplies or sensitive ecosystems;

(iii) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release; and/or

(iv) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.

Samples obtained from monitoring wells in the immediate vicinity of the Quarry have indicated that radioactive and chemically hazardous contaminants are migrating from the limestone Quarry in the direction of the St. Charles County well field. Although monitoring results indicate that the migration has not yet impacted the quality of water obtained from the well field, contaminants will continue to migrate into the groundwater system at the Quarry in the absence of a response action. To minimize the amount of contamination entering the uncontrolled environment, the Department believes that the source of this groundwater contamination should be removed in an expeditious manner. The Department, therefore, proposes to remove the contaminated material from the Quarry and transport it to the Chemical Plant area for safe storage pending a decision on its ultimate disposal. A decision on the need to conduct groundwater remediation at the Quarry would be made at a later date, along with a decision regarding any additional clean-up that may be required. This proposed removal action is in accordance with those actions identified in the NCP. According to Section 300.65(c)(6) of the NCP and Section 300.415(b)(4)(d)(6) of the proposed NCP, removal actions can consist of "<u>excavation, consolidation, or</u> removal of highly contaminated soils from drainage or other areas -- where <u>such actions</u> (removal) will reduce the spread of<u>, or direct contact with, the</u> contamination."

The Department of Energy is committed to conducting remedial actions at the Weldon Spring site in a timely manner, consistent with current regulations and requirements. The enclosure presents a schedule for conducting a remedial action with the preparation of a Focused Remedial Investigation/Feasibility Study (RI/FS) at the Quarry and a schedule for a removal action with the preparation of an Engineering Evaluation/Cost Analysis (EE/CA) report. These schedules indicate that performing this action as a removal will reduce the time required by eight (8) months. The Department believes the proposed action should be conducted as a removal action as defined

in the NCP. Documentation to support this decision will be presented in an EE/CA report, which will be provided to the USEPA, Region VII and the State of Missouri for review and comment prior to initiation of this action.

We would like to initiate removal activities at the Weldon Spring Quarry as soon as possible. Your expeditious review of this proposal will be appreciated.

Sincerely,

J H McCracken

for Rod Nelson
Project Manager
Weldon Spring Site
Remedial Action Project

Enclosure

cc: Dave Bedan, MDNR