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STATE OF MISSOURI
Mel Carnahan, Governor • Frank A. Nash, Director
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City MO 65102-0176

June 13, 1997

Ms. Karen Reed
Acting Project Director
Weldon Spring Site Remedial Action Project
7295 Highway 94 South
St. Charles, MO 63304

Re: Draft *Feasibility Study for the Remedial Action for the Quarry Residuals Operable Unit at the Weldon Spring Site, Weldon Spring, Missouri*, June 1997; and Draft *Proposed Plan for the Remedial Action for the Quarry Residuals Operable Unit at the Weldon Spring Site, Weldon Spring, Missouri*, June 1997.

Ref: 1. M. Windsor, MDNR, letter to K. Reed, DOE, dated 5/28/97.

Dear Ms. Reed:

We have received the above referenced documents. However, we do not agree that the Quarry Residuals Operable Unit (QROU) *Feasibility Study* and *Proposed Plan* "are inclusive of all major comments." The *Feasibility Study* and *Proposed Plan* build on the findings and conclusions of the *Remedial Investigation* and *Baseline Risk Assessment*, and several significant issues remain unresolved regarding the draft final *Remedial Investigation* and draft final *Baseline Risk Assessment* for the QROU.

The issuance of the draft *Feasibility Study* and *Proposed Plan* appears premature; we will perform a preliminary review of the drafts, but will withhold our approval pending resolution of the issues regarding the *Remedial Investigation* and *Baseline Risk Assessment*. In addition, we reserve the right to amend or supplement our comments on the draft *Feasibility Study* and *Proposed Plan* in response to changes in the *Remedial Investigation* and *Baseline Risk Assessment*.

As stated in Reference 1, among the unresolved issues from the QROU *Remedial Investigation* and *Baseline Risk Assessment* are:

1) The identification of the recreational visitor as the Reasonable Maximum Exposure (RME) scenario is unacceptable. A St. Charles County resident drinking contaminated groundwater through the public wells should be included as a reasonable exposure

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scenario and the risk evaluated. Groundwater drawn from the floodplain is currently being used as a residential source of drinking water. Sampling data from monitoring well RMW2 demonstrates that uranium from the quarry has already contaminated the groundwater within the floodplain. The *Remedial Investigation* states that migration of uranium across the Femme Osage Slough is "supported hydrologically" and "plausible." The characterization of the extent of uranium contamination into the floodplain is incomplete and further migration of uranium southward across the slough is not ruled out.

2) The long-term behavior of the redox zone and other physical and chemical processes claimed to prevent further migration of uranium has not been sufficiently evaluated. The location of the purported redox zone is unknown.

3) DOE inappropriately takes credit for dilution of contaminated groundwater within the public drinking water distribution system and, thereby, underestimates the risk from consumption of contaminated groundwater. In addition, such dilution does not reduce the amount of contamination entering the public water supply; rather, it merely spreads the contamination among a larger population.

Sincerely,

HAZARDOUS WASTE PROGRAM

Larry V. Erickson

Larry V. Erickson, P.E.
Chief, DOE Unit
Federal Facilities Section

LVE:gce

cc: Weldon Spring Citizens Commission
Dan Wall, USEPA Region VII