Tom/Yvonne

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

July 26, 1996

Mr. Jerry S. Van Fossen
Deputy Project Manager
Weldon Spring Site Remedial Action Project
7295 Highway 94 South
St. Charles, MO 63304

Re: Revised Draft Final: Engineering Evaluation/Cost Analysis (EE/CA) for the Southeast Drainage (June 1996)

Dear Mr. Van Fossen:

The following are comments submitted in reference to the above document that your office has requested:

1. Page 1, second paragraph, third sentence: The sentence implies that the sediment only has radioactive contamination. Since this is not the case, please clarify the statement.

2. Page 3, first paragraph, last sentence: The document indicates that material from the southeast drainage will be placed in the Ash pond area for interim storage. Is there enough room for this material?

3. Page 3, second paragraph: MDOH assisted in the development of this document and should be identified.

4. Page 7, section 2.2.1, second paragraph: Remediation is not to be based on mobilization of conventional equipment only, but should consider smaller, lower impact equipment in addition to the conventional equipment.

5. Page 7, section 2.2.1 second paragraph, last sentence: Please provide the documentation that determines that the number of samples collected in each segment is statistically adequate to support the risk conclusions.

6. Page 9, section 2.2.1, first paragraph, last sentence: Please provide the data sufficiency exercise documentation.

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7. Page 9, section 2.2.1, second paragraph: Bechtel performed many of the early studies for this area. Those studies indicated high levels of contamination in different portions of the drainage than what is shown in this document. Shouldn't the previous information also be included here? Also, has that previous information been included in the risk assessment?

8. Page 9, section 2.2.1, third paragraph: The document states that 10 samples were analyzed, 6 composite samples from 19 locations and 4 discrete samples. However, the figure referenced depicts many more than 10 locations. Please clarify.

9. Page 13, section 2.2.2, last paragraph, first sentence: Please provide what the higher levels of uranium are.

10. Page 17, section 2.3.1, second paragraph, fifth sentence: Please provide the subsurface data mentioned here. We have been unable to find the data in Appendix A. Why were there only two subsurface samples collected for chemical contaminants? Will two samples provide enough information to show that a statistically significant set of data was collected for the subsurface?

11. Page 19, section 2.3.2, first paragraph: Were the alpha and beta values used in the risk assessments? If these values were not used, what is the reasoning for exclusion?

12. Page 21, section 2.3.3: Why were only the springs used for surface water characterizations? Shouldn't information from near the mouth of the Southeast Drainage have been included?

13. If remediation option 2.1 is selected, DOE should continue monitoring the area to assure that sediment redeposition or further impact from groundwater to the soil has not increased the exposure. If future characterization data show exposure concerns, DOE would be responsible for remediation.

We do support DOE's plan to present the removal action at the status update public meeting, targeted for August 29, 1996. We strongly suggest that an opportunity for the DOD to participate in the status update portion of the meeting presentation be considered. DOE had agreed to providing this opportunity when

this meeting was being planned for an earlier date. Please let me know if this office can be of assistance in this regard.

If you have any question or need further clarification, please contact me at (573) 751-6838.

Sincerely,

HAZARDOUS WASTE PROGRAM

Larry V. Erickson

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

LVE:lbe

c: Dan Wall, EPA-Region VII