Karen/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

August 29, 1996

Mr. Jerry Van Fossen
Deputy Project Manager
U. S. Department of Energy
Weldon Spring Site Remedial Action Project
7295 Highway 94 South
St. Charles, Missouri 63304

Dear Mr. Van Fossen:

The Department of Energy, Weldon Spring Site Remedial Action Project, proposes to address the Southeast Drainage through a removal action supported by an Engineering Evaluation/Cost Analysis (EE/CA). The proposed action, as we understand, is to excavate selected contaminated materials within the drainage area. The risk level, as presented, is no greater than 1 in 10,000 additional cancers for children playing in the drainage.

At this time we find the proposed plan unacceptable. The Missouri Department of Natural Resources prefers that remediation of the Southeast Drainage be conducted to allow "unrestricted use." This is defined as no risk in excess of 1 in 1,000,000 additional cancers based on a residential scenario.

We recognize the unique and sensitive nature of the environment in the Southeast Drainage. We also recognize that the population in this area is rapidly expanding, which will affect the existing and future land use. Thus, we could accept Option 2.2 as described in the EE/CA, which provides a balance of maximizing removal of contaminated material and minimizing the ecological impact to the drainage. Also, this option provides no risk in excess of 1 in 100,000 additional cancers.

Minimizing the ecological impact to the area includes proper selection of the type and size of equipment used for remediation. Deed restrictions must also be placed on the property limiting future land use options if unrestricted levels are not obtained. In addition, continued monitoring must occur to ensure the cleanup remains protective. The Department of Energy will not be released from future liabilities should the area be recontaminated with radionuclides requiring additional cleanup.

RECYCLED PAPER

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If you have any questions or comments, feel free to contact me at (573) 751-6892.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY

John A. Young

John A. Young
Director

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c: Dan Wall, EPA Region VII