

Department of Energy

Washington, DC 20585

JUN 25 2003

Ms. Mimi Garstang, RG
Director and State Geologist
Missouri Department of Natural Resources
Division of Geology and Land Survey
P.O. Box 250
Rolla, Missouri 65402

Dear Ms. Garstang:

This is in response to your May 13, 2003, letter regarding the draft *Proposed Plan for the Final Remedial Action for the Groundwater Operable Unit at the Chemical Plant Area of the Weldon Spring Site*, dated March 2003. The Department of Energy (DOE) has reviewed the specific comments enclosed with your letter, and we believe that your Department's concerns should be addressed at the technical level. The DOE Weldon Spring site staff will be providing you with detailed responses to those comments to begin the process of resolving them.

As you know, over the past 17 years, DOE has accomplished a massive cleanup effort at the Weldon Spring site, at a cost of almost \$900 million. This effort has resulted in the excavation and permanent disposal of approximately 1.5 million cubic yards of waste. The isolation of this waste has removed the sources that were contaminating the groundwater, and has already led to reductions in the levels of groundwater contamination.

The DOE has also performed comprehensive investigations to understand the extent of contamination in the groundwater, and the geology that dictates groundwater flow patterns. We have examined numerous technologies that had the potential to clean up the residual contaminants in the groundwater, and we have implemented two of these technologies on a pilot scale. We have also extensively evaluated the potential risk to future users. The DOE has concluded that while it is not technically practicable to actively remediate the remaining contaminants at the site, the levels of contamination will decrease over time through natural processes.

Accordingly, we believe that monitored natural attenuation is the best remedy for the residual contaminants in the groundwater at this site. This belief is based not only on the impracticability of active remedies, but also on the low risk of this approach to those off the site and the ability of natural mechanisms to achieve the cleanup standards within a reasonable time period. Clearly, the success of this strategy depends in part on developing accurate plume characterizations identifying appropriate monitoring locations and action levels. The DOE's Weldon Spring site staff is prepared to work with your agency to address these technical issues.

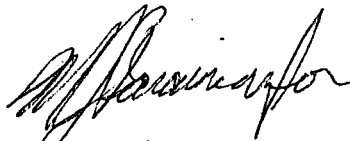


With regard to long-term stewardship, DOE has taken a number of steps over the last year to ensure that human health and the environment at Weldon Spring will remain protected. The most significant of these, is our plan to establish a new office, the Office of Legacy Management, as a separate entity within DOE to focus on the management of closed sites, such as Weldon Spring. In addition, we have held a series of public workshops in St. Charles County to discuss post-closure issues, with another such workshop to be held July 9, 2003, and we released a revised draft of the Weldon Spring Site, Long-Term Surveillance and Maintenance Plan on May 30, 2003. We believe that this revised plan is responsive to the comments provided by the public and the interested and affected governmental organizations. The DOE Weldon Spring site staff will also work with your staff to address the specific long-term stewardship issues that you raised in your letter.

Finally, DOE supports the involvement of the State of Missouri in the Weldon Spring cleanup effort, and to date has provided more than \$5 million to the State to facilitate its participation in that effort. With regard to a potential multi-party post-closure agreement, it is important to note that under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Environmental Protection Agency, is the lead regulatory agency and has primary enforcement responsibility for the Weldon Spring site. Nevertheless, DOE would consider entering into a post-closure agreement that incorporated the existing rights of the State of Missouri under CERCLA, if all parties agreed on its provisions.

If you have any further questions, please call me at (202)-586-9280.

Sincerely,



David Geiser, Director
Office of Long-Term Stewardship
Environmental Management

cc: Pam Thompson, DOE-WSSRAP
Ray Plieness, DOE-GJO
Dan Wall, EPA
Ed Galbraith, MDNR
Bob Geller, MDNR
Weldon Spring Citizens Commission
Kevin Wideman, MODOT
Kathryn Love, MDC

DW 5/30/03

Letter to Ms. Garstang from Mr. Geiser
Subject: RE: Draft Proposed Plan for Final Remedial Action for the
Groundwater Operable Unit at the Chemical Plant Area of the
Weldon Spring Site, Weldon Spring, Missouri, March 2003

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