UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

Ken
Rod
Steve
Doc. Control
File

JUN 16 1989

Mr. Rodney R. Nelson
U.S. Department of Energy
Weldon Spring Site Remedial
Action Project
Route 2, Highway 94, South
St. Charles, Missouri 63303

Dear Mr. Nelson:

The Environmental Protection Agency (EPA) has reviewed the Engineering Evaluation/Cost Analysis for the Proposed Management of 15 Nonprocess Buildings (15 Series) at the Weldon Spring Site Chemical Plant dated May 1989. We are in agreement with the Department of Energy on the need for the proposed action; however, the following comments should be considered prior to implementation of the proposed action and/or in the development of plans for future interim response actions.

1. The subject document allows for general comment on the advisability of the proposed action; however, the document does not allow for a complete evaluation of whether the work will be performed effectively and in compliance with applicable guidelines.

A work plan should be developed that will reference building-specific monitoring data, and identify specific actions planned for each building. The work plan should describe the sequence of proposed activities so as to minimize cross-contamination where possible (e.g., radioactive contamination of asbestos that could result from improper sequencing). Reasonable planning may reduce the amount of mixed waste generated by the cleanup activities.

The description of the proposed action does not include any procedures to be followed, but only an assurance that the action will conform to requirements. However, no specific commitment is

004033
6/21/89

made to conform with any specific requirements. The last paragraph on page 21 references dismantlement activities being conducted at the steam plant, Building 401. If applicable, the specific procedures and criteria controlling that work should be provided or referenced. If applicable procedures do not exist, they should be developed. The sequencing of cleanup activities, the criteria for cleanup, and the procedures to be used are essential elements to a complete estimate of the impact (occupational and environmental) and costs of the proposed action.

The proposed action does not identify contingency plans for use if contamination levels significantly in excess of the anticipated levels are encountered.

It is our understanding that the detailed work plan, containing the elements described above, will be developed by the selected subcontractor. We would appreciate the opportunity to review the plan prior to implementation of the proposed action.

Furthermore, we believe that in order to satisfy the public participation requirements of the EE/CA documentation process, the detailed work plan, as well as the subject document, should be made available for public comment prior to implementation of the work plan.

2. The intent of the document, in accordance with the EE/CA process, is to present and analyze alternatives to accomplish stated objectives. However, comparison of the stated alternatives does not appear to facilitate selection of a response action since there is no fundamental difference between the two alternatives (timing is the only difference). It appears that the criteria by which the alternatives are assessed are biased and implicitly favor the selection of the "preferred" alternative. In fact, the document is simply a statement of the proposed action (Alternative 1). In this case, we suggest that it would have been better to recognize upfront that due to the nature of the proposed action, certain aspects of the generic EE/CA documentation process cannot be logically applied. We believe that the needs to stabilize the site and allow for efficient performance of overall remedial actions are sufficient justifications for expedited dismantlement.

3. Four of the buildings to be addressed (No. 417, 433, 435, and 436) either show above background levels of external radiation, or lie close to other buildings or open areas that show such levels (see Figure 16, RI/FS Work Plan). It is not clear why it would not be appropriate to include these four

buildings in subsequent cleanup activities, as they appear to be more logically grouped with more contaminated buildings. Specific contamination data regarding these buildings were not provided. Such data may indicate a clear difference in contamination levels between these four buildings and the buildings not included in this plan.

The following should be added to Table A.2:

Requirement	Citation
Radiation Protection Guidance to Federal Agencies for Occupational Exposure	52 FR 2822

Content	Relationship to Proposed Action
Provides recommended limits and methods of calculations for occupational exposure to radiation for federal agency workers	Augments previous guidance on occupational exposures

Sincerely yours,

Michael J. Sanderson
Chief, Superfund Branch
Waste Management Division

cc: David Bedan, MDNR