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DEC 09 1987

Ms. B. Katherine Biggs
United States Environmental
Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Dear Ms. Biggs:

USEPA COMMENTS ON INTERIM RESPONSE ACTIONS (IRA'S)

Enclosed is our response to the comments contained in your letter of November 9, 1987, regarding the following interim response actions:

1. Dismantling of Building #401
2. Dismantling of Building #409
3. Removal of PCB Transformers
4. Debris Consolidation

We anticipate that this will adequately resolve the issues raised. We intend to proceed with action on these items in accordance with the enclosure.

If you have any questions, please give me a call.

Sincerely,

ORIGINAL SIGNED BY:
R. R. NELSON

Rod Nelson
Project Manager
Weldon Spring Site
Remedial Action Project

Enclosure:
As stated

cc: Dave Bedan, MDNR

DOCUMENT NUMBER: I-700-704-1.02

PEER:JCoyne:x41:mw:12/04/87: (c:EPA-IRA'.Ltr.)

CONCURRENCES

RTG SYMBOL	INITIALS/SIG.	DATE
PEER	J. Coyne	12/7/87
CE-541	R. Nelson	12/9/87

ORIGINAL FILE COPY

RESPONSIVENESS SUMMARY

B. Katherine Biggs letter to Rodney R. Nelson, dated November 9, 1987 re:

Interim Response Actions

1. Dismantling of Building #401
2. Dismantling of Building #409
3. Removal of PCB Transformers
4. Debris Consolidation

General

Comment: Generally, a more thorough analysis and screening of response alternatives would be appropriate.

Response: This comment was reviewed with the EPA (telecon from Rod Nelson to Dan Wall dated 11-17-87). The EPA agreed that while additional analysis and screening is not required for the four (4) IRA proposals addressed herein, future proposals such as the Ash Pond Isolation Dike will present a more thorough analysis of response alternatives.

Comment: The documents do not contain sufficient detail of the work to be done to stand alone without the support of the technical specifications and drawings.

Response: Technical specifications and drawings will continue to accompany the IRA proposal packages submitted for review.

Building Demolition

Comment: Specifics of handling, storage, and ultimate disposal of radioactively contaminated waste should be presented.

Response: Radioactively contaminated waste from demolition of Buildings #401 and #409 will be segregated and stored on-site in a dry, concrete floored building, Building #434 and/or Building #406. Ultimate disposal will be in accordance with the RI Plan/EIS. Specifics of handling this waste will be covered in the Contractor's operational work plan which will integrate the specification and drawings, the WSSRAP Construction Safety and Health Management Program, applicable WSSRAP Standard Operating Procedures and Plans along with the subcontractor dismantling plan. This work plan will be finalized prior to the Subcontractor(s) starting demolition work.

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Comment: What guidelines will be used by the demolition subcontractor to determine the hazard potential of unknown materials encountered in the work?

Response: Subcontractor personnel who will work on the site will be required to undergo a minimum of 40 hours of initial instruction in hazardous waste operations prior to starting work on site in accordance with 29CFR1910.120. In addition Subcontractor personnel will receive indoctrination training in the known hazards in the work area prior to start of work in accordance with the WSSRAP Construction Safety and Health Management Program and Special Conditions requirement of the subcontract. Unknown (unidentified or unmarked) chemical substances encountered in the work shall be considered potential hazards and shall be reported to the Contractor in accordance with the requirements of the specifications.

The Contractor will also provide health physics, construction safety and industrial hygiene surveillance on a routine basis during all stages of the work. This will include inspections of all work areas to identify potential hazards. Where required, the Contractor will collect bulk samples to identify any unknown or suspected substances. The Contractor will also perform air monitoring, as necessary and prudent, to assess exposure levels of hazardous substances in the workplace.

Comment: The responsibility for determining whether a pollution condition has or will be created should be clearly specified.

Response: The WSSRAP Construction Safety and Health Management Program which is an integral part of site subcontracts assigns responsibility for the identification of potential pollution (environmental) conditions to the Project Management Contractor. The Subcontractor is contractually required to comply with the requirements of the Clean Air Act and the Clean Water Act.

Comment: The specification does not state the health and safety requirements for the subcontractor.

Response: Subcontractor health and safety requirements are defined in the Special Conditions to the subcontract. The Special Conditions bind the Subcontractor to compliance with the WSSRAP Construction Safety and Health Management Program and all applicable Federal, State, and local health and safety regulations and standards listed therein. The Special Conditions are a supplement to the General Conditions and General Provisions which also contain basic health and safety requirements.

PCB Transformer Removal

Comment: In this case, more detail in the site characterization section of the text would be appropriate. For instance, the PCB transformers are categorized as those containing PCBs at concentrations greater than 500 ppm. It may be somewhat misleading not to indicate in the text that the concentrations in these transformers are in excess of 350,000 ppm.

Response: The final subcontract work package includes a table on the subcontract drawings listing each electrical component in the scope of work. This table includes the PCB concentration and volume capacity, in gallons, of each electrical component.

Comment: Disposal facilities under consideration for receipt of these wastes must provide certification that they meet the Superfund offsite policy.

Response: The Work Plan specified in Section 1.2A of Specification Section 02090 includes provision for meeting all requirements of 40CFR761. The Subcontractor's Work Plan in section 1.4A will be required to contain certification that the facilities selected for disposal of the waste material (1) have received written approval from the U. S. Environmental Protection Agency as required under 40CFR Part 761.70 or 761.75, as applicable, and (2) are not under a state or federal compliance order under CERCLA or RCRA.

Debris Consolidation

Comment: It is stated in the description of the response action that one of the response objectives is to "Perform a detailed chemical and radiological characterization of the debris...". The description of the response action and specifications document contain no guidelines, references or information which would allow the Subcontractor to complete this objective.

Response: This objective is to be completed by the Contractor and does not require any special activity by the Subcontractor. Radiological guidelines to be used by the Contractor in performing this characterization are as defined in Draft DOE Order 5480.11 and applicable WSS operating procedures. All debris will be visually inspected for potential chemical contamination. Where chemical contamination is observed or suspected, sampling and analyses will be performed to identify the characteristics of the chemical.

Comment: More specifics regarding the handling, storage and ultimate disposal of radioactive contaminated wastes are needed.

Response: Specifics of handling the radiologically contaminated debris will be finalized upon submittal of the Subcontractor's work plan. That plan will be integrated with applicable WSSRAP Standard Operating Procedures and Plans, the WSSRAP Construction Safety and Health Management Program, and the specifications and drawings. The debris will be consolidated for temporary storage in a materials staging area. Details of the materials staging area will be presented in a separate IRA under preparation. Ultimate disposal of radioactive contaminated debris waste will be in accordance with the RI Plan/EIS.