cc: D. R. Lewis
R. A. Nelson
A. J. Stewart

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

3589-87-I-EPA-010

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WSSRAP CONTRACT 3589

NOV 5 1987

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

Dear Mr. Nelson:

We have reviewed the Department of Energy's (DOE) proposals for the following four interim response actions:

- Electric Power and Pole Removal,
- Overhead Piping/Asbestos Removal,
- Cleanup of Vicinity Property No. 7 on the Army Reserve Area, and
- Disposal of Containerized Chemicals.

Our comments on these proposals were sent to you earlier. You were also provided comments by the Missouri Department of Natural Resources (MDNR). No comments from the public were directed to the Environmental Protection Agency (EPA) and according to our records, there has been no public comment directed to MDNR or DOE.

We are in agreement these actions should proceed to ensure worker safety and reduce the further release of contaminants from this site. The EPA hereby approves these actions under the condition that the comments earlier provided by EPA and MDNR are adequately addressed. The MDNR has notified me they also concur with these actions. Please provide copies of any summary reports for these actions to EPA and MDNR.

We also received copies of the following four interim response actions:

- Dismantling of Building 401,
- Dismantling of Building 409,
- Removal of PCB Transformers, and
- Debris Consolidation.

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We will provide any comments on these within the agreed upon 21-day comment period. We are most pleased to see that activities are underway to stabilize the site and reduce contaminant release.

Sincerely yours,

Morris Kay
Regional Administrator

cc: Dr. Fred Brunner, MDNR

bc: Robert Morby
Dan Shiel
Rowena Michaels
Ron Ritter

4711

NOV 10 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 October 8, 1987, regarding the following interim response actions:

1. Electric Power Line and Pole Removal
2. Overhead Piping/Asbestos Removal
3. Army Reserve Area Vicinity Property No. 7
4. Disposal of Containerized Chemicals

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

R. R. Nelson
Project Manager
Weldon Spring Site
Remedial Action Project

Enclosure:
As stated

cc: D. Bedan, MDNR
E. Brown, FLW
w/enclosure

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RTG SYMBOL CE-541
INITIALS/SIG. R. Nel
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RESPONSES TO USEPA REVIEW COMMENTS
ON IRA PACKAGES

Cleanup of Vicinity Property No. 7, Army Reserve Area

Comment: The proposal to cleanup this vicinity property calls for excavating the contaminated area to a depth of six (6) inches or where the radium concentration is below 15 pCi/g and then backfilling with clean material. The EPA suggests that while its criteria for residual radium in soil is satisfied by this approach, that we consider removing additional soil to reduce the concentration to below 5 pCi/g. As the area is small, little additional excavation would be required.

Response: Subsequent to the preparation of the IRA package for Army Reserve Vicinity Property #7, the Deparment of Army requested that the area not be backfilled upon completion of the cleanup as proposed by the DOE. The DOE will leave the excavation area open and apply the suface criteria of 5 pCi/g to this particular vicinity property.

Disposal of Containerized Chemicals

Comment: It is suggested that the specifications for this work might be strengthened by adding waste characterization procedures into Section 2.0 (Scope) of the document. The procedures are those which may be required under 40 CFR 260-268, or others required by the permit held by the Treatment, Storage and/or Disposal Facility.

Response: Procedures required in 40 CFR 260-268 will be referenced in Section 2.0 of the Request for Proposal. In addition, it will be emphasized that all waste characterization procedures which are required by the successful bidder's treatment, storage and/or disposal facilities permit must be satisfied. It will be required that these procedures (if applicable) be presented in the subcontractor's work plan.

Comment: EPA recommends that the specific subcontractor qualifications and experience in handling known and unknown potentially hazardous wastes be defined in the document.

Response: We are in agreement with the EPA that the Request for Proposal should contain subcontractor qualifications and experience clauses. The appropriate clauses will be added to the document.

Comment: The EPA recommends that the specification require the successful bidder to identify the specific waste disposal facilities which will accept the containerized chemical waste, in the work plan phase.

Response: The specification will be modified to include provision for certification by the subcontractor that the waste disposal facilities meet the requirements when hazardous wastes are involved. The land disposal ban provision of RCRA will also be addressed as part of the subcontractor's work plan.

General

Comment: The EPA review states that there is one(1) deficiency common to the four proposals and that is that plans for onsite handling and storage of radioactive contaminated materials should be developed.

Response: Plans for onsite handling and storage of radioactive contaminated materials are currently being finalized and will be provided under separate cover.