

583

**OPERABLE UNIT 4 - REMEDIAL INVESTIGATION
(RI) REPORT**

11-06-90

DOE/USEPA

DOE-215-91

3

LETTER



Department of Energy

FMPC Site Office
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6319

NOV 06 1990

DOE-215-91

Ms. Catherine A. McCord, Remedial Project Manager
U. S. Environmental Protection Agency
Region V - 5HR-12
230 South Dearborn Street
Chicago, IL 60604

Mr. Graham E. Mitchell, DOE Coordinator
Ohio Environmental Protection Agency
40 South Main Street
Dayton, OH 45402

Dear Ms. McCord and Mr. Mitchell:

OPERABLE UNIT 4 - REMEDIAL INVESTIGATION (RI) REPORT

- References:
- 1) Letter, C. A. McCord to B. J. Davis, "OU #4 RI Disapproval U.S. DOE Fernald OH6 890 008 976," dated September 27, 1990
 - 2) Letter, G. E. Mitchell to B. J. Davis, "RI/Risk Assessment O.U. 4," dated October 2, 1990
 - 3) Letter, DOE-40-91, A. P. Avel to C. A. McCord, "Operable Unit 4 - Remedial Investigation (RI) Report," dated October 26, 1990

References 1 and 2 transmitted U.S. EPA and Ohio EPA comments on the first draft of the Remedial Investigation (RI) Report for Operable Unit 4. The comments ranged from risk assessment calculations to the adequacy of the data available to support a complete site characterization and selection of a preferred alternative for Operable Unit 4.

Reference 3 requested a 20 day extension from October 29, 1990, in order to revise the RI Report and respond to U.S. EPA and Ohio EPA comments.

Enclosed is the revised RI Report and responses to U.S. EPA and Ohio EPA comments. This version of the report does not include the results of the current K-65 silos residue sampling, the K-65 silos berm sampling, or the slant borings under the Silos. These

583

sampling activities are either currently underway or planned in the near future. The report does include previous data collected for Operable Unit 4, including the 1989 sampling of Silos 1, 2, and 3.

There are currently three options available for completing work on Operable Unit 4. The options include:

- 1) Request a schedule extension from U.S. EPA. The schedule extension would allow for the completion and characterization of the residue sampling, the berm sampling and slant borings and treatability studies. This data would be used to revise the RI Report and prepare the FS Report and eventually the Record of Decision. The schedule extension would be approximately 10-12 months.
- 2) Continue along the current schedule for Operable Unit 4. All outstanding data would be incorporated into the process when available.
- 3) Silos 1 & 2 could be treated on a separate schedule from Silos 3 & 4. This would allow remediation of Silos 3 & 4 on the current schedule. The schedule for Silos 1 & 2 could be extended consistent with option 1.

DOE's current position is to select option number 2. The reasons for this are:

- a. The sampling data will most probably not change the alternative that has been selected in the draft proposed plan or the alternative evaluation in the Feasibility Study Report. This alternative is to remove the K-65 residues, berms and underlying soils, and the silo structures, and to store/dispose the material on-site. All in-situ disposal alternatives will not be acceptable to the public, EPA, or DOE. Since there is currently no place to ship the material, off-site disposal alternatives would also not be acceptable. Therefore, there is little risk that the selected alternative will change. The only probable change will be in the treatment of the waste which can be developed in the remedial design process.
 - b. Even if options 1 or 3 were selected, there is no guarantee that we can meet the extended schedule and get all of the data.
 - c. The information gained from the sampling is important for remedial design process. This information will be available in time to support remedial design and the Record of Decision in August, 1991.
- 2

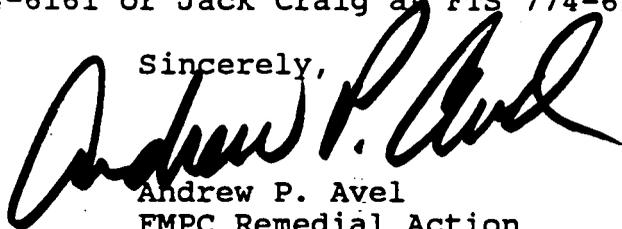
- 583
- d. Since this is the first Operable Unit on the remediation schedule it is very important for DOE and the EPAs to do all that is possible to maintain the schedule. Credibility will be demonstrated by using the data we have available and exercising sound technical judgment as an argument to not extend the schedules.

DOE is prepared to meet with U.S. EPA and Ohio EPA to discuss the options as outlined above. It is critical all three agencies reach a consensus on the approach to completing this Operable Unit.

DOE is making every effort to meet the Consent Agreement schedules and at the same time make sound technical decisions throughout the CERCLA process.

Your expeditious review of this plan for completion of Operable Unit 4 RI/FS activities is requested. If you have any questions, please contact me at FTS 774-6161 or Jack Craig at FTS 774-6159.

Sincerely,



Andrew P. Avel
FMPC Remedial Action
Project Director

DP-84:Craig

Enclosure: As stated

cc w/encl.:

R. P. Whitfield, EM-40, FORS
W. D. Adams, EW-90, ORO
P. J. Gross, SE-31, ORO
W. E. Muno, USEPA-V
P. Q. Andrews, USEPA-V
J. Benetti, USEPA-V
K. J. Pierard, USEPA-V
D. A. Ullrich, USEPA-V
E. Schuessler, PRC
K. Davidson, OEPA-Columbus
L. August, GeoTrans (2)
R. L. Glenn, Parsons
D. A. Nixon, WMCO
J. Razor, IT