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**RESPONSES TO U.S. EPA COMMENTS ON THE
WORK PLAN FOR THE FEASIBILITY STUDY
(AUGUST 1988)**

08/15/90

**DOE-1733-90
DOE-FMPC/USEPA
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LETTER**

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[REDACTED]

Department of Energy

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AUG 13 1990
DOE-1733-90

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

Mr. Graham E. Mitchell
Ohio Environmental Protection Agency
40 S. Main Street
Dayton, Ohio 45402

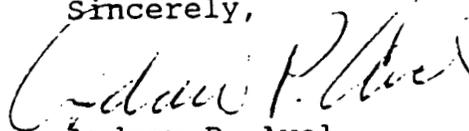
Dear Ms. McCord and Mr. Mitchell:

RESPONSES TO U.S. EPA COMMENTS ON THE WORK PLAN FOR THE FEASIBILITY STUDY (AUGUST 1988)

Reference: Letter, DOE-1645-90, Bobby Davis to Catherine McCord and Graham Mitchell, "Revised Feasibility Study Work Plan," dated August 9, 1990

On August 10, 1990 this document was transmitted via facsimile to Catherine McCord. The subject document is being transmitted for your review and approval.

Sincerely,



Andrew P. Avel
FMPC Remedial Project Manager

DP-84:Fermaintt

Enclosure: As stated

cc w/encl.:

L. P. Duffy, EM-1, FORS
P. Q. Andrews, U.S. EPA-V
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ATTACHMENT 1

RESPONSES TO U.S. EPA COMMENTS ON THE
WORK PLAN FOR THE FEASIBILITY STUDY (AUGUST 1988)

COMMENT 1:

Section 2.2.3, Page 5, Paragraph 1: The last sentence contradicts the first point of the paragraph, which states that any actions at this operable unit will not be expected to impact other operable units.

RESPONSE TO COMMENT 1:

The perceived contradiction does not, in fact, exist. The first point in the paragraph is that the remedial action decision process for Operable Unit 3 can proceed independent of the other operable units since the local nature of the actions for Operable Unit 3 will have little or no effect on other sources or environmental media. The last sentence in the paragraph refers to the possibility that the action itself (and not the repercussions of the action) could be interrelated with other site activities. The latter activities were not meant to include other RI/FS activities, but rather activities such as ongoing WMCO maintenance programs that could "fix" a continuing release outside the RI/FS process.

This section has been changed to reflect the updated definition of Operable Unit 3.

COMMENT 2:

Section 2.2.4, Page 5: The justification given for several areas being included in one operable unit indicates that there are two distinct wastes that are significantly different and would most likely require different methods of treatment. Generally, when different treatment methods are required, a separate operable unit can be created and technologies developed or assessed to address it.

RESPONSE TO COMMENT 2:

At the time of preparation of the August 1988 version of the FS Work Plan, Operable Unit 4 was envisioned to include the four waste storage silos and the thorium inventory. As Operable Unit 4 evolved, the thorium inventory was dropped due to its inclusion under other remediation programs at the FMPC so that only the silos remained as Operable Unit 4.

While the waste materials in the silos differ, it is still appropriate to include all of the silos in Operable Unit 4 due to:

- Geographic proximity of the silos to one another
- Common structural characteristics

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(Continued)

- Strong likelihood that environmental and health and safety protection measures necessary for the remedial actions for the silos will be similar and more efficiently implemented for the silos as a group

The revised FS Work Plan maintains the definition of Operable Unit 4 as the four silos without the thorium inventory.

COMMENT 3:

Section 2.4, Page 10, Paragraph 1, Reference to Table 2.3: The work plan does not describe how the list of potential remedial actions in Table 2.3 was developed.

RESPONSE TO COMMENT 3:

The list of potential remedial actions was developed in large part from the information provided in the approved RI/FS Work Plan, which in turn had been developed from available guidance documents and the input from experienced contractor personnel. This list is preliminary--it was included in Section 2.4 primarily to further justify the selection of operable units based on the similarity of types of remedial actions appropriate for the respective operable units. The citing of particular types of actions in this table does not exclude other types of remedial actions from future consideration in the FS process. The formal identification and screening of the universe of technologies and the subsequent development of alternatives was the purpose of the "Development of Alternatives" task which has been completed. Accordingly, this table has been removed from the FS Work Plan.

COMMENT 4:

Section 2.3, Page 8, Item 7: The objective should also state that established standards are not necessarily protective. Therefore, the FS work plan should state that the target risk range for carcinogens.

RESPONSE TO COMMENT 4:

DOE agrees with the intent of the comment. The public health protection objective will be refined for each type of exposure pathway in later stages of the FS process, including the finalization of ARARs. It will be as part of these forthcoming activities that the target range will also be formally established.

COMMENT 5:

Section 2.4, Page 10, Paragraph 1: The FS work plan does not describe how Table 2.3 was developed. It appears that the purpose of this table is to show the interdependency of potential remedial actions between operable units and between areas within operable units. Additionally, /

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there is an interdependency of potential remedial actions between operable units. This does not meet the intent of operable unit concept.

RESPONSE TO COMMENT 5:

Much of this comment has already been addressed under Comment 3. Several factors went into the identification of operable units at the FMPC, as presented in Section 2.0 of the FS Work Plan. While the independence of remedial actions was the primary criterion for the demarcation of operable units, full success in achieving this goal was not attained due to the influence of other important factors in the selection process. DOE feels that the interdependency of actions has been minimized to the extent practicable within the context of the sitewide issues, and is confident that the interdependencies can be successfully dealt with as the individual Records of Decision are formulated and defended. To attempt to refine operable unit definitions at this point in time, using the interdependency issue as the sole criterion, would highly disrupt the ongoing RI/FS program and associated schedules without a commensurate benefit realized.

COMMENT 6:

Section 3.4.6, Page 11, Paragraph 1, Last sentence: The last sentence and the three bullets should more closely parallel RI/FS guidance.

For source control actions, the following types of alternatives should be developed to the extent practical: number of treatment alternatives ranging from one that would eliminate, or minimize the need for long term management; one or more alternatives that involve containment; and a no-action alternative.

COMMENT 7:

Section 3.4.6, Page 11: In accordance with RI/FS guidance, groundwater response action should address the cleanup levels and timeframes. Alternatives should be developed that achieve ARARs as rapidly as possible.

RESPONSE TO COMMENTS 6 AND 7:

The "Development of Alternatives Task" was completed in December 1988. Accordingly, the issues raised by Comments 6 and 7 will not be addressed in the FS Work Plan. Rather, these technical concerns will be addressed individually by each operable unit in Task 12, Initial Screening of Alternatives.