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**OU#5 INITIAL SCR ALT  
U.S. DOE - FERNALD  
OH6 890 008 976**

**11/26/90**

**USEPA/DOE-FMPC  
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LETTER  
OU5**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
230 SOUTH DEARBORN  
CHICAGO, ILLINOIS 60604

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NOV 26 1990

REPLY TO ATTENTION OF:

Mr. Andrew P. Avel  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

5HR-12

Re: OU#5 Initial Scr Alt  
U.S. DOE Fernald  
OH6 890 008 976

Dear Mr. Avel:

On August 27, 1990, the United States Department of Energy (U.S. DOE) submitted an Initial Screening of Alternatives (ISA) report for Operable Unit (OU) #5. The United States Environmental Protection Agency (U.S. EPA) disapproved this document on September 27, 1990, and U.S. DOE submitted a revision on October 27, 1990. U.S. EPA has reviewed this document for completeness, technical adequacy, and compliance with the national contingency plan (NCP) and U.S. EPA Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA (OSWER Directive 9355.3-01). There are some inaccurate or inadequate responses to U.S. EPA's comments on the initial on the August 27, 1990, draft.

1. Response #3 states that U.S. DOE has transmitted a complete set of analytical results to U.S. EPA. This is not accurate. Complete analytical results from sampling of March 1989 and latter have not been submitted.
2. Response #14 states that additional meteorological data was added to the text. No new data any discussion of how site-specific information compares to Dayton or Cincinnati was presented in the revision.
3. Response #25 is reasonable, but needs to be supported by subsequent sampling.
4. Response #63 states that additional information would be included in the revised text to support the selection of ion exchange as the process option representative of this technology. While U.S. EPA supports this position, no such information could be found in the revised ISA.
5. Response #100 is not correct and does not reflect the approach

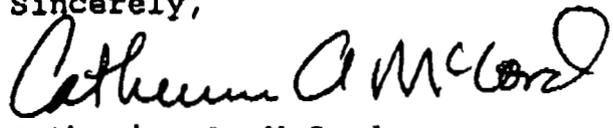
that is being taken in the Remedial Investigation (RI). The fact that a contaminant was not initially identified as a suspect contaminant in the RI/FS work plan is not a justification for not addressing it now. The work plan recognized that there was many unknowns regarding characterization and that is why an expanded hazardous substance list (HSL) analysis was and still is being performed.

Additionally, U.S. EPA and U.S. DOE have had extensive discussions regarding potential Applicable and Relevant and Appropriate Requirements (ARARs). It is currently premature to set forth any soil or groundwater cleanup standard.

While there are some problems with the comment responses, U.S. EPA feels that the ISA report for OU #5 is adequate and hereby approves the document.

If there any questions, please contact me at (312/FTS) 886-4436.

Sincerely,



Catherine A. McCord  
Remedial Project Manager

- cc: Richard Shank, OEPA
- Graham Mitchell, OEPA - SWDO
- Joe LaGrone, U.S. DOE - ORO
- Leo Duffy, U.S. DOE - HDQ