

**REVISED WORK PLAN FOR THE SOUTH
GROUNDWATER CONTAMINATION PLUME
REMOVAL ACTION - PART I - ALTERNATE
WATER SUPPLY**

12/05/90

**DOE-373-91
DOE-FMPC/USEPA & OEPA
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LETTER
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Department of Energy

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DEC 05 1990

DOE-373-91

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

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

Dear Ms. McCord and Mr. Mitchell:

**REVISED WORK PLAN FOR THE SOUTH GROUNDWATER CONTAMINATION PLUME
REMOVAL ACTION -PART I - ALTERNATE WATER SUPPLY**

- Reference:
- 1) Letter, Catherine McCord to Mr. Andrew P. Avel, "South Plume Water Supply Work Plan Comments," dated on November 5, 1990.
 - 2) Letter, Graham E. Mitchell to Mr. Andrew P. Avel, "Alternate Water Supply Work Plan Comments," dated on November 2, 1990.

On September 4, 1990 the United States Environmental Protection Agency (US EPA) approved Part I - Alternate Water Supply of the Engineering Evaluation/Cost Analysis (EE/CA) for the South Groundwater Contamination Plume Removal Action. A Work Plan for this removal action and task specific Health and Safety Plan was submitted to US EPA on October 4, 1990.

Comments from the US EPA and Ohio EPA were received by the DOE on November 5, 1990 and November 2, 1990, respectively. In accordance with the 1990 Consent Agreement, the revised Work Plan and task specific Health and Safety Plan are being submitted within thirty (30) days.

If you have any questions, please contact me at FTS 774-6161 or Carlos J. Fermaintt of my staff at FTS 774-6157.

Sincerely,



Andy Avel
FMPC Remedial Action
Project Manager

DP-84:Fermaintt

Enclosures: As stated

cc w/encl.:

R. P. Whitfield, EM-40, FORS
W. D. Adams, EW-90, ORO
P. J. Gross, SE-31, ORO
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E. Schuessler, PRC
W. H. Britton, WMCO
S. M. Peterman, WMCO
R. L. Glenn, Parsons

RESPONSE TO USEPA's COMMENTS
SOUTH GROUNDWATER CONTAMINATION PLUME
REMOVAL ACTION
PART 1
ALTERNATE WATER SUPPLY
WORK PLAN

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General Comments

1a. Comment:

Discuss preliminary operations and maintenance manual to be completed at the final design stage.

Response:

An Operations and Maintenance Manual for each facility will be prepared during the final design stage.

Action:

The work plan was revised to reflect this comment. A copy of the Operations and Maintenance Manual will be transmitted to the EPA for information.

1b. Comment:

Discuss the Quality Assurance Plan for construction-related sampling and testing to be completed at the final design stage.

Response:

The Quality Assurance Plan is an existing document (FMPC-2139) which covers all construction related activities at FMPC.

Action:

No changes to the work plan are required. A copy of the Quality Assurance Plan will be transmitted to the EPA for information.

1c. Comment:

Discuss the cost estimates to be completed at the preliminary and final design stages.

Response:

Cost estimates were provided in the EE/CA document for this removal action which was submitted to the USEPA on November 15, 1990. The preliminary design document will include a more detailed cost estimate.

Action:

The preliminary design document and cost estimate will be transmitted to EPA under a separate cover for informational purposes.

2. Comment:

The work plan should identify the permits (off-site) and permit requirements (on-site) that must be complied with for this removal action.

Response:

Agreed

Action:

The work plans has been modified to include a section pertaining to permit requirements.

3. Comment:

As discussed with U. S. DOE, the work plan should not be titled "Phase 1" because of the implication that there are more phases to this effort. The term "part" had been agreed on to delineate the different aspects of removal #3 for the south plume (water supply, collection wells, and treatment system).

Response:

Agreed.

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Action:

The title will be changed to "South Groundwater Contamination Plume Removal Action, Part 1, Alternate Water Supply Work Plan".

4. Comment:

A preliminary design document (at 30% complete) should be submitted for review.

Response:

A preliminary design document will be submitted under a separate cover.

Action:

A preliminary design document will be transmitted under a separate letter.

Specific Comments

5. Comment:

Section III, Page 4, Paragraph 2: The consultant/contractor that will be working on the various phases of the project should be presented (including design and installation).

Response:

ASI, as a contractor to DOE, is conducting the RI/FS program including activities such as groundwater sampling and development of a groundwater flow model for the south plume. ASI is also providing analytical support through their subcontractor, IT Corporation.

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A. M. Kinney Inc., as a contractor to WMCO, is providing project design for the Part I removal action. 935

Rust Engineering, as a contractor to WMCO, will provide construction management for the Part I removal action.

The contractor for the well installation will be determined through the DOE bid and award process.

Action:

The work plan has been modified to include the consultants/contractors who will be working on the various phases of the Part 1 removal action.

6. Comment:

Section III, Page 4, Paragraph 4: Specific analytes used to determine groundwater quality must be presented.

Response:

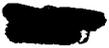
In addition to the HSL and RAD analytes, other specific analytes for determining groundwater quality can be found in Attachment II of the work plan. Also the Ohio EPA will sample the wells and verify the water quality.

Action:

No change to the work plan is required.

7. Comment:

Section III, Page 5, Paragraph 5: The project planning activities should be presented. These activities must be addressed in the preliminary design review. The planning activities do not appear on the Attachment I schedule.



Response:

The project planning activities will be listed on the detailed (Level 4) schedule. The duration of specific activities will remain as stated in Attachment I of the work plan. Approval dates for the removal action will be determined after final approval of the work plan. A copy of the detailed schedule will be provided to EPA following approval of the work plan.

Action:

No change to the work plan is required.

8. Comment:

Section III, Page 6, Paragraph 2: The status of construction personnel 29 CFR 1910.120 training should be specified.

Response:

All personnel working in the construction phase of the Part I removal action will be trained in accordance with the Occupational Safety and Health Administration (OSHA) standards found in 29 CFR 1910.120

Action:

The work plan has been modified to include the training requirements for construction personnel.

9. Comment:

Section IV, Page 6, Paragraph 5: The design capacity of the well for Industrial User A and the requirements of the performance acceptance test should be addressed in the preliminary design review.



Response:

The design capacity of the well for Industrial User A will be less than 50 gallons per minute. The performance acceptance will be similar to that for Industrial User B.

Action:

The workplan has been modified to reflect this change.

10. Comment:

Attachment I, Page 11: Dates must be presented in the schedule.

Response:

A detailed (Level 4) schedule will be prepared after approval of the work plan. The detailed schedule will be consistent with the schedule in Attachment I.

Action:

No change in the work plan is required. A detailed (Level 4) schedule will be provided to EPA after approval of the work plan.

**RESPONSE TO OhioEPA's COMMENTS
SOUTH GROUNDWATER CONTAMINATION PLUME
REMOVAL ACTION
PART 1
ALTERNATE WATER SUPPLY
WORK PLAN**

Specific Comments

1. Comment:

Page 4, 2.0: Discuss the possibility that the replacement well for industrial user A may actually draw uranium into the lower aquifer and actually spread the contamination.

Response:

A decision has been made by DOE to relocate the well for Industrial User A outside the area of the contamination plume.

Action:

The work plan has been modified to include the revised location of the well for Industrial User A

2. Comment:

Page 6, 4.0, Paragraph 2: What is meant by the phrase "If the installation of a replacement well will be necessary."?

Response:

This is a typographical error.

Action:

The statement has been removed from the work plan and the paragraph has been revised to include the new location of the well for Industrial User A.

3. Comment:

Page 6, 4.0, Paragraph 3: It is not good practice to install well screens where they will not be submerged in water. If the screen is installed as described, the top portion of the screen will be exposed after drawdown occurs.

Response:

The top portion of the screen will be installed five feet below the surface of the water to prevent exposure after drawdown occurs. The drawdown is expected to be less than five feet as shown in the EE/CA on Figure A-7.

Action:

The work plan will be modified to include the changes to the well installation.

4. Comment:

Page 12, Attachment II: Volatile organic compounds should be included in the list of parameters to be monitored.

Response:

Volatile organic compounds are included in the HSL list which will be monitored for in the preliminary testing and the continuous monitoring.

Action:

No change to the work plan is required.

5. Comment:

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Page 2, Attachment III Site History: Uranium has been found in relatively high concentrations on the site of industrial user A. There is a history of contamination for Part 1.

Response:

See response to Comment #1.

Action:

The work plan will be modified to include the revised location of the well for Industrial User A.