R-014-207.3

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REMOVAL #5 - DECANT TANK
U.S. DOE FERNALD
OH6 890 008 976

1-10-91

USEPA/DOE
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LETTER

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

[redacted]

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Due to EPA 2/11/91

JAN 10 1991

REPLY TO ATTENTION OF:
5HR-12

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

Re: Removal #5 - Decant Tank
U.S. DOE Fernald
OH6 890 008 976

Dear Mr. Avel:

On October 18, 1990, the United States Department of Energy (U.S. DOE) submitted a work plan for Removal #5, the silo decant tank. The silos and this tanks are included in Operable Unit (OU) #4. The United States Environmental Protection Agency (U.S. EPA) disapproved the work plan on November 13, 1990 and U.S. DOE submitted a revision on December 11, 1990. U.S. EPA has reviewed the revised work plan and has the following comments:

1. The amount of time for detailed design and completion of the removal is excessive. U.S. DOE's response to U.S. EPA comments 5, 11, and 22 is inadequate. U.S. DOE did not offer an adequate explanation of why such lengthy periods of time are required for completion tasks required under the work plan.

2. U.S. DOE's response to U.S. EPA comments 1 through 3 (November 13, 1990, work plan disapproval) is not entirely correct. The technical issues addressed by OSWER Directive Number 9355.04-A can apply to any design and construction activity, whether the response action is Fund-financed or not. Additionally, this U.S. EPA guidance document also pertains the responsible party Remedial Design/Remedial Action (RD/RA) activities. A preliminary design report, and cost estimates at the preliminary and final design stages allows U.S. EPA to monitor if a response action is being conducted in an efficient and cost-effective manner.

3. U.S. DOE's response to U.S. EPA comment 20 is inadequate. The work plan does not present the analytical results for total radionuclides from the water sample collected in October 1990. Samples collected from the decant sump tank in October 1990 must be analyzed for total radionuclides,

cesium-137, strontium-90, ruthenium-106, lead-210, actinium-227, and protactinium-231.

U.S. EPA is approving the work plan with the following modifications:

1. All sampling and analysis must be performed in accordance with the U.S. EPA-approved Quality Assurance Project Plan (QAPjP). Any required revisions to the QAPjP should be submitted to U.S. EPA for review and approval.

2. U.S. DOE must submit to U.S. EPA a preliminary design report (at approximately 30% complete), and cost estimates at the preliminary and final design stages.

3. Within thirty (30) days from the date of this approval, U.S. DOE is to provide a more detailed explanation and justification of time-frames required to complete tasks required for this removal. If time-frames can not be justified, the schedule must be modified accordingly.

4. Within thirty (30) days of the date of this approval, U.S. DOE must submit a list of potential Applicable or Relevant and Appropriate (ARARs) and a strategy for compliance with them.

5. Within thirty (30) days of the date of this approval, or upon receipt of analytical results by U.S. DOE or Westinghouse, U.S. DOE submit the analytical results from the October 1990 sampling of the decant sump tank. Samples collected from the decant sump tank in October 1990 must be analyzed for total radionuclides, including total uranium, isotopic uranium, technetium-99, cesium-137, strontium-90, ruthenium-106, lead-210, actinium-227, and protactinium-231.

If you have any questions contact me at (FTS/312) 886-4436.

Sincerely yours,

Catherine A. McCord

Catherine A. McCord
Remedial Project Manager

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