

2119

**DISAPPROVAL OF INACTIVE FLY ASH
PILE/SOUTHFIELD REMOVAL ACTION WORK PLAN**

09-18-91

USEPA/DOE-FSO

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LETTER



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

2119

SEP 18 1991

REPLY TO ATTENTION OF:

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

5HR-12

RE: Disapproval of Inactive
Fly Ash Pile/Southfield Removal
Action Work Plan

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Inactive Fly Ash Pile/Southfield Removal Action Work Plan.

U.S. EPA hereby disapproves the Work Plan pending incorporation of the attached comments.

Please contact me at (312/FTS) 886-0992 if you have any questions.

Sincerely,

James A. Saric
Remedial Project Manager

Enclosure

Date Rec'd SEP 23 1991
Log EN804
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cc: Graham Mitchell, OEPA-SWDO
Pat Whitfield, U.S. DOE-HDQ

ATTACHMENT A

**Comments on the Inactive Fly Ash Pile
Removal Action Work Plan**

1. The work plan should include a more detailed schedule complete with a list of schedule of site activities such as the start of the removal action, completion date of the removal action, and submittal of removal action report.
2. The work plan does not discuss fugitive dust and air emission controls. These items should be addressed.
3. Figure 2 should show area of contamination as defined by CIS and RI/FS. In addition the level of contamination should be noted on the figure or in a table.
4. A rope or 3.5-foot fence is not adequate to prevent trespassers. Additional action such as a 6 foot high fence with barbed wire should be considered. The actual method of control should be presented in the work plan not an either or option.
5. The radiological survey should be discussed in more detail, including the type of radiological survey to be conducted, methodology for determining sampling locations, number and spacing of sampling locations, and the contaminant level that is considered safe.
6. DOE should provide EPA with a report after the completion of the removal action. This report should briefly describe the objectives of the removal action, the activities performed, analytical results of any sampling, and justification of any deviation from the removal action work plan.