

2320

**INACTIVE FLYASH PILE CONTROL REMOVAL
ACTION #8 WORK PLAN COMMENT
RESOLUTION/REVISED WORK PLAN**

10-22-91

DOE-165-92
DOE-FSO/EPA
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LETTER



Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
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2320

OCT 22 1991

DOE-165-92

Mr. James A. Saric, Remedial Project Director
U. S. Environmental Protection Agency
Region V - 5HR-12
230 South Dearborn Street
Chicago, Illinois 60604

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

Dear Mr. Saric and Mr. Mitchell:

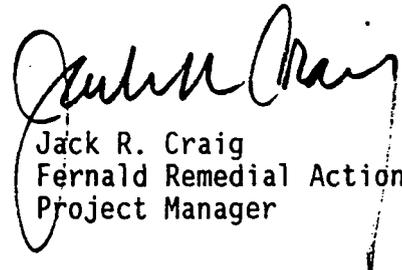
**INACTIVE FLYASH PILE CONTROL REMOVAL ACTION #8 WORK PLAN COMMENT
RESOLUTION/REVISED WORK PLAN**

- Reference: 1. Letter, G. E. Mitchell to J. R. Craig, "Comments on the
Inactive Fly Ash Pile/Southfield Removal Action Work Plan,"
dated August 28, 1991
2. Letter, J.A. Saric to J. R. Craig, "Disapproval of Inactive Fly
Ash Pile/Southfield Removal Action Work Plan," dated September
18, 1991

Enclosed for your review and approval are the responses to comments received
in the referenced letters and a revised Removal Action Work Plan, for the
Inactive Flyash Pile Control Removal Action.

If you or your staff have any questions or comments, please contact Johnny
Reising at FTS 774-9083 or (513) 738-9083.

Sincerely,


Jack R. Craig
Fernald Remedial Action
Project Manager

FO:Reising

Enclosure: As stated

cc w/encl.:

J. J. Fiore, EM-42, GTN
K. A. Hayes, EM-424, GTN
M. Butler, USEPA-V, 5CS-TUB-3
J. Benetti, USEPA-V, 5AR-26
K. Davidson, OEPA-Columbus
T. Schneider, OEPA-Dayton
E. Schuessler, PRC
L. August, GeoTrans
R. L. Glenn, Parsons
K. Reidel, Parsons
H. F. Daugherty, WEMCO
S. W. Coyle, WEMCO
J. P. Hopper, WEMCO
R. J. Skalka, WEMCO
J. D. Wood, ASI
B. Wu, ASI
T. Tucker, LWA
AR Coordinator, WEMCO

COMMENT RESOLUTION FOR

U. S. EPA AND OHIO EPA COMMENTS ON

**THE INACTIVE FLY ASH PILE/SOUTHFIELD DISPOSAL AREA
REMOVAL ACTION WORK PLAN**

Sent./Line #

Original Comment # 4

Comment: 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 present in the work plan not an either or option.

Response: DOE has determined that roping¹ would be the most appropriate control measure. The decision to use a rope was based on timeliness, effectiveness, implementability, and cost. This control measure is adequate to restrict human access to the IFAP/SF since this area already has very limited public access and is heavily posted with access control signs. The IFAP/SF is located on the Fernald Environmental Management Project (FEMP) site, which has a fence around its perimeter. The most accessible way to the IFAP/SF, if unnoticed by security, is via the access road leading from the Willey Road access road. The other possible access would be climbing the southern FEMP perimeter fence along Willey Road, crossing a wooded area and Paddy's Run Creek. Also, human intrusion has not been a problem for this area in the past and the roping and the posting of warning signs are additional preventative measure to deter human access.

Action: None required.

5.	Commenting Organization: U. S. EPA	Commentor:
	Pg. # Section #	Paragraph #
	Sent./Line #	Original Comment # 5

Comment: 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.

Response: It has been determined that the entire IFAP/SF will be roped rather than delineating smaller areas, therefore, specific limits and survey procedures will not be required. They have been removed from the work plan (see revision 1).

Action: The radiological survey activity has been removed from the work plan.

¹A "Rope" for this removal action is a reference to a yellow Bradylink Warning Chain made of B-900 Polyethylene. This material was chosen for its superior durability over rope.

Response: Agree.

Action: Objectives have been provided in paragraph one of the Introduction and paragraphs one and two of Section IV. Also, the addition of how the removal action will be directed and coordinated was added to Section IV.

9.	Commenting Organization: Ohio EPA	Commentor:
	Pg. # Section #	Paragraph #
	Sent./Line #	Original Comment # 1
		Specific Comments

Comment: II., Section 1.0, Page 1: Specific data summaries from the CIS investigation should be included in order to provide justification for a time-critical removal action. These data should help define within the work plan the areas to be investigated during the field radiological survey. The section should also detail the levels of radionuclide contamination which are considered to pose a threat to individuals casually entering the IFAP/SF. This information will provide action limits for determining boundaries of the removal Action during the field radiological survey.

Response: Data summaries and evaluations which justify the removal action are given in the RSE (see attached). The lead agency determined that a planning period of less than six months existed before beginning removal activities; therefore, this removal action is time critical. The threat posed by levels of radionuclide contamination is discussed in the RSE. Since the entire area is being roped off, the survey has been deleted from the work plan (see response to comment #5).

Action: RSE has been attached.

10.	Commenting Organization: Ohio EPA	Commentor:
	Pg. # Section #	Paragraph #
	Sent./Line #	Original Comment # 2
		Specific Comments

Comment: II., Section 1.0, Page 1: The CIS study should be cited in a reference section.

Response: Agree.

Action: The proper citation of the CIS has been added to Section II, 1.0 of the revised work plan.

11.	Commenting Organization: Ohio EPA	Commentor:
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Pg. # Section #
Sent./Line #

Paragraph #
Original Comment # 3
Specific Comments

Comment: II., Section 2.0, Page 1, 4th Paragraph: If the sampling discussed in this paragraph is that being conducted under the OU 2 Additional Work Plan Addenda, then the work plan should be referenced within this section. If the sampling is not a part of that work plan, then additional information should be provided within the text.

Response: Agree.

Action: Reference to the OU 2 Additional Sampling Work Plan Addenda has been included in the revised work plan.

12. Commenting Organization: Ohio EPA
Pg. # Section #
Sent./Line #

Commentor:
Paragraph #
Original Comment # 4
Specific Comments

Comment: IV., Section 1.0 Page 3, 5th Paragraph: Specific limits and procedures must be set forth within this plan stating the radiological contamination levels which will be enclosed in the fenced area. These limits should be used in conjunction with the field radiological survey to delineate the extent of the fenced area.

Response: It has been determined that the entire Inactive Fly Ash Pile/Southfield (IFAP/SF) will be roped, and therefore, specific limits and survey procedures will not be required. They have been removed from the work plan (see response to comments #5 and #9).

Action: None required.

13. Commenting Organization: Ohio EPA
Pg. # Section #
Sent./Line #

Commentor:
Paragraph #
Original Comment # 5
Specific Comments

Comment: IV., Section 1.0, Page 3, 6th Paragraph: It is difficult to understand why DOE cannot at this time commit to fencing the area. If this is actually justifiable as a time-critical removal action, it would seem that adequate justification is available to construct a fenced enclosure. The effectiveness of rope (or a 3.5 foot fence) for preventing intrusion into the IFAP/SF is questionable at best. Defined objectives are required within this work plan to state what is to be achieved by this removal action.

Response: DOE has committed to roping the area, which combined with the warning signs, has been determined to be the most expeditious, implementable, and cost-effective measure for deterring human intrusion (see response to comments #4 and #8).

Action: Area will be roped.

14. Commenting Organization: Ohio EPA
Pg. # Section #
Sent./Line #

Commentor:
Paragraph #
Original Comment # 6
Specific Comments

Comment: V., Page 4, 3rd Paragraph: This section must provide more detail concerning the radiological survey. Methods and RI/FS QAPP SOPs should be cited. The type of field instruments to be used should be described and their respective detection limits and error stated. The action level for the removal action should be discussed as well as the methodology for assuring all contaminants above this level are enclosed. Air monitoring should be included in the SAP in order to document fugitive dust emissions before, during and following removal action implementation.

Response: The radiological survey will not be conducted to delineate specific areas of contamination, since the entire IFAP/SF will be roped.

Action: None required.

15. Commenting Organization: Ohio EPA
Pg. # Section #
Sent./Line #

Commentor:
Paragraph #
Original Comment # 7
Specific Comments

Comment: VII., Page 4, Last Paragraph: Is the "QAP" discussed in this section RI/FS QAPP? If not, the removal action should be conducted in a manner consistent with the RI/FS QAPP and the soon-to-be submitted site-wide QAPP. Ensuring that the removal action activities are consistent with the RI/FS QAPP will assure the data is useful for further RI/FS activities.

Response: Agree.

Action: QAP has been changed to RI/FS QAPP.

16. Commenting Organization: Ohio EPA
Pg. # Section #

Commentor:
Paragraph #

Sent./Line #

Original Comment # 8
Specific Comments

Comment: Figure 1: A scale should be provided on the figure.

Response: Agree.

Action: A scale has been provided.