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**REVISION 1 - PART 1, ALTERNATE WATER
SUPPLY WORK PLAN FOR THE SOUTH
GROUNDWATER CONTAMINATION PLUME
REMOVAL ACTION**

12/31/91

**DOE-601-92
DOE-FO/EPA
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LETTER
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Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
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DEC 31 1991

DOE-601-92

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 45402-2086

Dear Mr. Saric and Mr. Mitchell:

**REVISION 1 - PART 1, ALTERNATE WATER SUPPLY WORK PLAN FOR THE SOUTH
GROUNDWATER CONTAMINATION PLUME REMOVAL ACTION**

- References: 1) Letter, G. E. Mitchell to A. P. Avel, "Conditional Approval Part 1 South Plume Removal Action Work Plan," dated January 8, 1991
- 2) Letter, DOE-044-92, J. R. Craig to J. A. Saric and G. E. Mitchell, "Request for Schedule Extension on Parts 1, 2, & 3 of the South Groundwater Contamination Plume Removal Action," dated November 20, 1991
- 3) Letter, J. A. Saric to J. R. Craig, "U.S. DOE Request for Extension on Parts 1, 2, and 3 of the South Plume Removal Action," dated December 6, 1991
- 4) Letter, G. E. Mitchell to J. R. Craig, "South Plume Schedule Extensions," dated December 9, 1991

This letter transmits the responses to the Ohio EPA comments (Enclosure 1) and the Revision 1 to the Work Plan for Part 1 of the South Groundwater Contamination Plume Removal Action (Enclosure 2).

Revision 1 to the Part 1 Work Plan reflects changes to the project that have developed since the January 1991 approval of the document. Revision 1 of the Work Plan includes a revised project completion date as requested in Reference 2. The revised project completion date was approved by the U.S. EPA and Ohio

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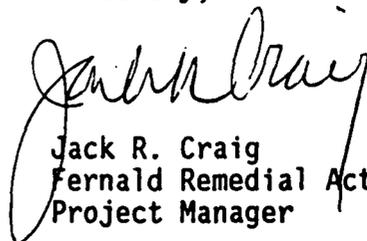
EPA in References 3 and 4, respectively. Ohio EPA has conditionally approved the Work Plan (Reference 1) pending responses to its comments. This revision incorporates responses to the Ohio EPA comments accordingly.

The modifications to the Work Plan are shown highlighted and the text to be deleted is shown struck out to facilitate your review. The highlighting and struck-out text will be removed upon U.S. EPA and Ohio EPA review of the revised Work Plan.

Subsequently, the Health and Safety Plan is being revised to reflect the changes to the Work Plan. The approved Health and Safety Plan will be made available to the U.S. EPA and Ohio EPA upon request.

If you or your staff have any questions, please contact me at FTS 774-6159 or (513) 738-6159, or Carlos J. Fermaintt, of my staff, at 774-6157 or (513) 738-6157.

Sincerely,


 Jack R. Craig
 Fernald Remedial Action
 Project Manager

FO: Fermaintt

Enclosures: As Stated

cc w/encls.:

J. J. Fiore, EM-42, TREV
 K. A. Hayes, EM-424, TREV
 K. Davidson, OEPA-Columbus
 T. Schneider, OEPA-Dayton
 J. Benetti, USEPA-V, 5AR-26
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 E. Schuessler, PRC
 L. August, GeoTrans
 R. L. Glenn, Parsons
 D. J. Carr, WEMCO
 S. W. Coyle, WEMCO
 J. P. Hopper, WEMCO
 J. D. Wood, ASI/IT
 J. E. Razor, ASI/IT
 L. Kahill, Radian
 AR Coordinator, WEMCO



RESPONSES TO OHIO EPA'S COMMENTS DATED JANUARY 8, 1991
SOUTH GROUNDWATER CONTAMINATION PLUME
REMOVAL ACTION
PART 1
ALTERNATE WATER SUPPLY
WORK PLAN

~~8-009-100-41~~

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Specific Comments

1[A]. Comment:

The work plan fails to account for the fact that Industrial User B is located on the Paddys Run Road site (PRRS).

Response:

The Work Plan has been revised to account for the fact that Industrial User B, Albright & Wilson Americas Inc. (AWA), is located on the Paddys Run Road Site (PRRS).

Also, Delta Steel has replaced its Industrial User A designation and Ruetgers-Nease Chemical Co., Inc. has replaced its Industrial User C designation. The Work Plan also reflects the renaming of the Feed Materials Production Center (FMPC) to the Fernald Environmental Management Project (FEMP) and Westinghouse Materials Company of Ohio (WMCO) to Westinghouse Environmental Management Company of Ohio (WEMCO).

Action:

The Work Plan has been revised accordingly.

1[B]. Comment:

Figure 1 of the work plan does not sufficiently detail the location of the company or the excavation route for the water supply line making it difficult to predict contamination which may be encountered during construction.

Response:

The figure has been replaced by the 100% design review construction drawing.

Action:

The figure has been replaced by the 100% design review construction drawing.

1[C]. Comment:

The potentially responsible parties (PRPs) for the PRRS have entered into an Administrative Consent Order with the state of Ohio to perform an RI/FS at the site. Recent remedial investigation soil boring samples at the site have shown high concentrations of various organic and inorganic compounds in addition to above background concentrations of the radioactive isotope potassium-40. DOE needs to work more closely with the PRRS PRPs in order to determine contaminant levels in the locations where the proposed alternate water supply lines will run and incorporate this information into the work plan.

Response:

Integration of the RI/FS efforts has been initiated and will continue between the DOE and the PRRS PRPs to determine the contaminant levels of the PRRS in the area where the Part 1 pipeline will be located.

Action:

A field screening and sampling and analysis plan has been attached to the Work Plan which includes monitoring and sampling strategy in areas suspected of contamination, including AWA property. As additional PRRS information becomes available, it will be included in revisions to the Health and Safety Plan, if deemed necessary.

1[D]. Comment:

The work plan needs to incorporate the potential risks and measures to decrease the risks associated with the contaminants of the PRRS.

Response:

Soil field screening, using portable photoionization detectors (PIDs) and radiation detection devices, will be performed during sampling activities, and if determined necessary, during the pre-construction site preparation activities. Based on the data obtained from the PID and radiation detection devices and subsequent soil analyses, if warranted, the level and type of personal protective equipment (PPE) can be modified to decrease the risks to personnel working in the PRRS area. Exposure symptoms are included and action levels revised to reflect the risks associated with the PRRS contaminants.

Action:

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The Health and Safety Plan will be revised accordingly.

1[E]. Comment:

The work plan also needs to incorporate this information into a sampling plan for the soil which is excavated on the PRRS.

Response:

See Comment 1[C].

Action:

See Comment 1[C].

1[F]. Comment:

The work plan also needs to incorporate this information into a sampling plan for the soil which is excavated on the PRRS in order to determine appropriate disposal criteria, since contaminated soils will potentially be encountered.

Response:

Soils in the PRRS will be returned to the excavation from which they originate. Excess excavated soils will be the responsibility of the PRRS to manage and determine the appropriate disposal criteria.

Action:

See Section IV of the Work Plan.

2. Comment:

Page 9, Section VII: DOE must comply with the following Ohio state law since the alternate water supply pumps will be located off-site and thus subject to state permitting and regulatory controls.

ORC 1521.16: Requires any owner of a facility, or combination of facilities, with the capacity to withdraw more than 100,000 gallons of water daily (GPD) to register such facilities with the Ohio Department of Natural Resources, Division of Water.



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Response:

The DOE will register the Part 1 water supply wells with the Ohio Department of Natural Resources, Division of Water.

Action:

The Work Plan has been revised to reflect this response.

