

2840

**DISAPPROVAL OF EXPERIMENTAL TREATMENT
FACILITY REMOVAL ACTION WORK PLAN**

12-02-91



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

2840

REPLY TO THE ATTENTION OF:

DEC 02 1991

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

HRE-8J

RE: Disapproval of Experimental
Treatment Facility Removal
Action Work Plan

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Experimental Treatment Facility Removal Action Work Plan.

U.S. EPA hereby disapproves the Work Plan. The deficiencies are enclosed.

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

Sincerely,

James A. Saric
Remedial Project Manager

Enclosure

cc: Graham Mitchell, OEPA-SWDO
Pat Whitfield, U.S. DOE-HDQ

DEC 04 1991

F-0878

ATTACHMENT A

COMMENTS ON THE EXPERIMENTAL TREATMENT FACILITY
REMOVAL ACTION WORK PLAN

GENERAL COMMENTS

1. The work plan for the Experimental Treatment Facility (ETF) removal action does not provide sufficient information to illustrate that it will meet the objectives of the ongoing remedial investigation/feasibility study (RI/FS). Additional information is needed concerning the laboratories conducting the analysis, disposition of waste materials, and sampling and analysis.
2. The work plan should include the preparation and submittal of a removal action report to EPA. This report should include a description of all field activities, document all samples collected and chain-of-custody procedures, analytical results, and present conclusions and recommendations.
3. Several sections of the work plan state that the containers will be properly marked and labelled. This description is vague, and more specific information should be provided by either detailed description or by attaching an appropriate standard operating procedure (SOP).
4. Several sections of the work plan state that the containers will be transported to a RCRA storage area. Section 4.2.10 states that the RCRA storage area will be in compliance with 40 CFR 264. The work plan needs to provide additional specific information on how the drums will be stored. In addition, 40 CFR 264 does not include the storage of radioactive waste in its scope. Additional regulations and DOE orders that describe how this "mixed waste" will be stored should be referenced.
5. The work plan does not provide specific information concerning the number of samples to be collected from each media (waste materials, underlying soils, ETF structural material). The sampling plan should provide a table which estimates, for each media, the number of investigative samples, number of quality assurance samples, analytical data quality level, and required analysis.

SPECIFIC COMMENTS

6. Page 9, Section 2.3: Data Chem Laboratories is not included in the list of laboratories approved in the Quality Assurance Project Plan (QAPjP) or in DOE's letter dated October 31, 1991, requesting approval of additional laboratories. The work plan should provide information concerning the type of analysis to be performed by the laboratories and the analytical data quality level required.

7. Page 10, Section 2.4: This section states that vegetation surrounding ETF will be surveyed using field instrumentation. However, the sampling plan section of this work plan does not address field surveying either vegetation or soils. The sampling plan should be revised to include field screening of both media and a detailed description of field activities.
8. Page 14, Section 4.2.5: The work plan states that vegetation will be disposed of in accordance with SOP #FMPC-720 "control of construction waste." This SOP should either be described or attached to the work plan.
9. Page 15, Section 4.2.6(f): The work plan does not include monitoring for dust emissions during this phase of the removal action. The work plan should either justify why monitoring is not necessary or provide information on how it will be conducted.
10. Page 15, Section 4.2.6(g): Specific information on how representative samples will be collected should be provided.
11. Page 16, Section 4.2.9: The work plan should include specific references for decontamination procedures to be used. This should include decontamination of sampling equipment, decontamination location, and specific decontamination procedures.
12. Page 17, Section 5.0: The work plan should specify the number and location of samples to be collected and analyzed. The rationale for the number and location should also be clearly provided.
13. Page 17, Section 5.0: The work plan should clearly present the rationale for determining if and when additional samples may be necessary.
14. Page 17, Section 5.0: Toxicity characteristic leaching procedure (TCLP) analysis should be included to provide information for final disposition of waste materials and soils.