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R-027-207.2

**DISAPPROVAL OF REMOVAL ACTION 16
COLLECT UNCONTROLLED PRODUCTION AREA
STORMWATER RUNOFF WORK PLAN**

04/21/92

USEPA/DOE-FN

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LETTER

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REPLY TO THE ATTENTION OF:

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 Removal Action 16-
Collect Uncontrolled Production
Area Stormwater Runoff Work Plan

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Removal Action 16-Collect Uncontrolled Production Area Stormwater Runoff Work Plan. U.S. DOE has proposed to complete this Removal Action within twenty-two (22) months. The National Contingency Plan (NCP) requires an Engineering Evaluation/Cost Analysis (EE/CA) to be conducted for Removal Actions exceeding six (6) months. Given the straightforward nature of this Removal Action, U.S. EPA does not believe this removal action should take more than six (6) months to complete. Therefore, U.S. DOE must take action to expedite this Removal Action.

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

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
Dennis Carr, WMCO

ATTACHMENT

**COLLECT UNCONTROLLED PRODUCTION AREA STORMWATER RUNOFF WORK PLAN
REMOVAL ACTION NO. 16**

GENERAL COMMENTS

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1. The work plan does not provide any method for determining the effectiveness of the RA. The work plan should describe how the proposed RA will meet the objective of protecting human health and the environment. The work plan should present the current situation in quantifiable terms, such as the concentration of contaminants in surface water and soils as well as volumes of uncontrolled surface water. In addition, the work plan should present specific quantifiable goals that can be measured to determine the effectiveness of the RA. In part this issue may be addressed by providing the removal site evaluation (RSE) as an appendix.

2. The work plan does not present any discussion of applicable or relevant and appropriate requirements (ARAR). The EPA Guidance on the Consideration of ARARs During Removal Actions (EPA/540/P-91/011) requires that ARARs be identified in the action memorandum's work plan stage. The national contingency plan (NCP) (40 CFR 300.415(i)) requires that the RA shall attain ARARs to the extent practicable, and that waivers described in 40 CFR 300.430(f)(1)(ii)(C) may be used. The work plan should present specific ARARs that will need to be considered, a description of why they should be considered or waived, and any waiver justification.

3. The work plan does not include any formal reporting requirement. The work plan should include an interim report to EPA describing the results of pre-excavation sampling and a final report describing all RA activities and a determination of its effectiveness.

5. The figures provided in the work plan are inadequate to describe the RA. The figures should include a scale and a complete description of field activities. For instance, the work plan should include figures showing current drainage patterns and proposed containment of drainage conditions.

SPECIFIC COMMENTS

6. Section 4.1, Page 9, paragraph 1: The four drawings referenced (C-2 through C-5) are inadequate to fully describe the field actions required to complete the RA. The work

plan should present specific information describing the necessity and scope of each proposed field action as well as the specific activities to be completed.

7. Section 8.0, Page 14, paragraph 1: The schedule presented in the work plan is inadequate to describe the work and allow EPA to track the progress of the RA. The schedule should present, at a minimum, start and finish dates of the design, dates for bid and award of subcontracts (if necessary), start and finish dates for pre-excavation sampling activities, start and finish dates for construction activities, and dates for interim and final reports.
8. Section 8.0, Page 14, paragraph 1: The completion date of December 31, 1993 (22 months after the work plan submittal date), appears excessive for completing this "time critical" RA, considering the relative ease of implementation. DOE should reconsider the time requirement and present a revised schedule or provide justification for needing 22 months to complete a relatively straightforward RA.
9. Attachment 1, Section 3.0, page 2: This section discusses several sample locations (for example SSI-30) but fails to identify them in any of the figures. The location of all sample locations discussed should be identified in a figure.
10. Attachment 1, Section 4.0, page 2: Sample locations 12 through 14 appear to be outside the trench area shown in Figure C-3. This discrepancy should be addressed.
11. Attachment 1, Section 4.0, page 3: The trench drain identified, which is to occupy the same location as samples 39 through 42, is not shown on Figure C-4. Figure C-4 should be corrected.
12. Attachment 1, Section 4.0, page 3: The discussion in this section is inadequate to justify the sample points illustrated in Figures C-6 through C-8. The work plan should provide the rationale for the number of samples and the location and spacing of samples.
13. Attachment 1, Section 5.0, page 3: None of the randomly selected depths presented in Table 1 are below a depth of 3 feet. The work plan should describe how samples will be collected if the excavation is advanced below 3 feet.
14. Attachment 1, Section 5.0, page 3: The installation of 12-inch-diameter reinforced concrete pipe (RCP) will require excavation; however, the work plan does not address soil sampling in these areas. The work plan should either add sampling in these areas or explain why no sampling is planned.

15. Attachment 1, Table 2, page 6: The work plan does not provide specific rationale for selecting sample locations for hazardous substance list (HSL) analysis. The work plan should provide specific rationale for selecting some locations over others for HSL analysis.
16. Attachment 2, Section 1.1, page 1: New waste piles, containing mixed or hazardous waste, generated from the RA must meet the substantive minimum technology requirements in 40 CFR 264 Subpart L.
17. Attachment 2, Section 1.2, page 1: No apparent difference exists between the handling of Category I and Category II soil. The work plan should provide additional information to clarify this issue.
18. Attachment 2, Section 1.2, page 1: The work plan does not address soils that are classified as RCRA wastes and have depleted uranium concentrations of less than 100 picocuries per gram (pCi/g) or thorium concentrations of less than 50 pCi/g. The work plan should address soils meeting this description.
19. Attachment 2, Section 1.2, page 1: The work plan proposes to combine all excavated soils into three waste piles. Excavated soils should be separated based on field screening to avoid mixing (1) potentially low-level waste with soils that are not low-level wastes or (2) soils that are potentially RCRA hazardous wastes with those that are not.
20. Attachment 2, Section 1.2, page 1: The work plan divides excavated soils into several categories based on their average contaminant concentrations. However, the work plan does not describe how the average concentration will be determined. Averaging the analytical results from the pre-excavation sampling is not appropriate. Waste piles should be sampled and characterized in a manner consistent with EPA Document SW 846.
21. Attachment 2, Section 1.2, page 1: Redistributing soils that are above the potential cleanup level of 35 pCi/g for uranium and 10 pCi/g for thorium may not be appropriate and may not comply with ARARs.