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**APPROVAL OF REMOVAL ACTION 13 - PLANT 1  
ORE SILOS WORK PLAN**

**05-15-92**

**USEPA/DOE-FN  
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LETTER**

R-019-707.3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

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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: Approval of Removal Action 13-  
Plant 1 Ore Silos 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) revised Removal Action 13-Plant One Ore Silos Work Plan. This Work Plan outlines the approach to remove eight tile and six concrete silos. This document has addressed the majority of U.S. EPA's comments satisfactorily.

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Saric".

James A. Saric  
Remedial Project Manager

Enclosure

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

TECHNICAL REVIEW COMMENTS  
PLANT 1 ORE SILOS REMOVAL ACTION NUMBER 13  
WORK PLAN

GENERAL COMMENTS

1. The executive summary states that the material in the appendices is included for informational purposes only and is not subject to approval. As a result, the attachments were not reviewed. EPA's previous comments, such as those on the Quality Assurance Plan (Appendix G) may still apply. Specific quality assurance requirements incorporated into written and approved procedures, as stated in Section 10, should be submitted to the EPA for review and approval.
2. Section 8.3, which discusses sampling and monitoring related to dismantling activities, is vague. Furthermore, it does not specify what waste streams may be generated as a result of dismantling activities. This section should clearly indicate what rationale will be used to identify the need for waste characterization sampling and how sampling will be implemented. Sampling and analysis of these waste streams should be addressed here and in Section 6.6.
3. Section 8.4, which discusses the post-dismantling environmental monitoring, should state that soil sampling will be conducted in any area affected by spills that occur during the removal action.
4. The schedule (Section 7.2) and reporting (Section 7.3) components of the work plan do not include a report. At a minimum, the removal action should be documented with a final report. This report should meet the same content requirements as On-Scene Coordinator (OSC) reports. These requirements are defined in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) Subpart 300.165.

5. The cover letter for the work plan references a set of responses and actions addressing EPA and OEPA comments. EPA did not receive or review a summary of these comments and DOE responses and actions.

#### SPECIFIC COMMENTS

- Section 4, page 4-1, paragraphs 1 and 3: The work plan says that grab samples were taken from inside the tile silos. However, paragraph 3 states that Toxicity Characteristic Leaching Procedure (TCLP) tests are available for the concrete silos only. This inconsistency should be explained.
- Section 6.4.2, page 6-5: The removal sequence does not address the dismantling-related sampling that is required to determine the material's character and disposition. EPA recommends that dismantling-related sampling steps be included in the removal sequence.
- Section 8.1, page 8-1: The sampling objectives are clear; however, the manner in which objectives 2 and 3 will be met during the removal action should be elaborated upon in Section 8.3.
- Section 8.3, page 8-4, paragraph 2: According to the text, surface water samples will be collected at the entrance to the storm sewer system during significant storm events. However, surface water samples should be collected from within the temporary dike provided at the base of the containment areas. If contaminants are found in these samples, the water can be pumped to the treatment plant before discharge into the storm sewer system.

- Section 8.3.1, page 8-4, paragraph 8: The portions of the site-wide quality assurance project plan (QAPjP) that are applicable to the sampling and analysis activities in this removal action should be referenced in this section. The representativeness of the samples collected during the dismantling-related sampling should also be discussed.

U.S. Department of Energy  
Fernald Environmental Management Project

Plant 1 Ore Silos:  
Removal Action Number 13

Response to Comments  
Revision No. 1  
March 1992

Comments by  
U. S. Environmental Protection Agency  
Region V, Radiation Section

GENERAL COMMENTS

Response to Comments — In general, response to previous comments were satisfactory and addressed points of concern. In view of the reorganization of the work plan, a special effort needs to be made to incorporate the changes noted in the response to comments into the body of the work plan in appropriate sections. In a number of instances, although U.S. Department of Energy (DOE) indicated that changes would be made, they failed to include these changes in text within the work plan. Such cases are noted below in Specific Comments.

SPECIFIC COMMENTS

Response to Comments, USEPA, Part III, No. 17 — The response here states that all pre-construction samples will undergo analysis for full radiological parameters as well as full HSL constituents and TCLP. This requirements needs to be included in the text of Section 8-2 of the revised work plan. (See revised work plan, Section 8-2, p. 8-2, paragraph 1). Full radiological analysis is mentioned later in the section, but should be included everywhere that sampling parameters are described.

Response to Comments, USEPA, Part III, No. 21 — The response here notes that the text in Section 8-3 will be rewritten to include information on release of materials that have potential for decontamination. No such modification appears in the revised work plan. Section 8-3 needs to be amended to reflect the changes noted by DOE in response to comments.

The last paragraph of Section 8-3 notes that materials intended for release will be surveyed in accordance with PS-P-35-010. Response to comments (see No.23) states that a copy of this procedure will be attached to the work plan, but not such procedure was submitted. A copy of PS-P-35-010 needs to be submitted for review so that any inconsistencies between it and other decontamination limits cited can be resolved.

Response to Comments, USEPA, Part III, No. 29 -- USEPA recognizes its error in stating the contamination limits that apply to release of personnel and equipment. Otherwise, the comment stands as originally stated, and was not adequately addressed. Special attention needs to be given to the monitoring technique used to determine if contamination limits are being exceeded. Standard frisking distance and rates (one-half inch away from the surface at one to two inches per second, for example) may not allow for detection of levels as low as 300 dpm/100 cm<sup>2</sup>. Specific guidelines for conducting surveys of equipment and personnel for release from a controlled area should be developed to ensure that the lower limits of detection will include levels at 300 dpm/100 cm<sup>2</sup>. An outline of such procedures (or at least a reference to the method contained in appendices, if necessary) should be included in the body of the work plan.

Also, although the response to comments noted that the contamination limit that applies is 300 dpm/100 cm<sup>2</sup>, this information is not included in Section 8.2 of the revised work plan. The limit should be stated on p. 8-2 where release of materials from a controlled zone is discussed.