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**APPROVAL OF REMOVAL ACTION 17 - IMPROVED
STORAGE OF SOIL AND DEBRIS**

09-30-92

**USEPA/DOE-FN
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LETTER**



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

R-028-707.2

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SEP 30 1992

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 17-
Improved Storage of Soil and Debris

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 17 Improved Storage of Soil and Debris Work Plan. This Work Plan adequately addresses the majority of U.S. EPA's comments. However, the Work Plan still mentions the Area of Concern (AOC) concept and the need for a waiver from the Land disposal restrictions (LDR). On August 18, 1992, the Containment Building Rule became final. As a result, the use of AOC's or a LDR waiver is not necessary. Therefore, all references to AOC's and LDR waivers should be removed. Also the design criteria of the central storage facility must meet that of the containment building criteria.

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,

James A. Saric
Remedial Project Manager

Enclosure

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

IMPROVED STORAGE OF SOIL AND DEBRIS
REMOVAL ACTION NO. 17 WORK PLAN

GENERAL TECHNICAL COMMENTS

1. The revised DOE removal action (RA) work plan uses the concept of an AOC which would require EPA to provide waivers from LDR requirements. As discussed in the September 21, 1992, meeting with DOE, EPA believes that the upcoming final regulation for containment buildings makes DOE's use of this approach unnecessary. DOE should remove the AOC concept from the report and should instead assure that containment buildings used to store hazardous or potentially hazardous soil and debris meet containment building design criteria.
2. DOE has not adequately addressed previous General Comment Number 3. This comment requested that DOE provide a mechanism for reporting planned removals and details for the disposition of removed soils. The letter accompanying the RA work plan indicates that a yearly update report will be provided, but this information is not included in the RA work plan. The document should be revised to include reports that indicate schedules for planned removals and information on the disposition of soil and debris. At a minimum, the reports should indicate the location of planned and completed removals, information on the types and volumes of waste, and analytical data used to support soil and debris classification.