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U.S. EPA AND OHIO EPA COMMENTS AND DISPOSITION RECORDS PILOT PLANT SUMP REMOVAL ACTION NO. 24 WORK PLAN (ABANDONED SUMP WEST OF PILOT PLANT) OCTOBER 1992

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DOE-FN/EPA
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COMMENTS

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U.S. EPA AND OHIO EPA COMMENTS AND DISPOSITION RECORDS

PILOT PLANT SUMP
REMOVAL ACTION NO. 24 WORK PLAN
[ABANDONED SUMP WEST OF PILOT PLANT]

Fernald Environmental Management Project

October 1992

COMMENT DISPOSITION RECORD

Document: Pilot Plant Sump Removal Action #24 Work Plan

Reviewer: U.S. EPA

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#	COMMENT	PROPOSED DISPOSITION
	GENERAL COMMENTS	
1	The removal action (RA) work plan includes provisions for sampling to support health and safety and to ensure compliance with applicable or relevant and appropriate requirements (ARAR). However, the references to numbers and types of sample analyses are vague. Also, analytical support levels (ASL) are referenced only by level (A, B, C, or D); the specific analytical methods, analytical parameters, and method detection limits are not provided. The U.S. Department of Energy (DOE) should supply specific information on numbers of samples, required analytical parameters, and analytical methods (broken down by ASL and the corresponding method). DOE should/must also provide sample-specific information with regard to containerization; sample volume; sample preservation and holding times; and required quality control sampling, including preparation of field duplicates, blank samples, and matrix spike duplicates.	The sample quantities and associated analyses will be expanded upon and clarified. Sampling and analysis summary table 6-4 will be developed that lists the specific samples, their types and locations, sampling procedures, analytical procedures, and ASLs. The analytical procedures, container and preservation requirements, and method detection limits are presented in detail in the SCQ. Rather than restate that information in the RAWP, direct and specific references will be made to SCQ sections, and procedures. Affected pages: 6-5, 6-7, 6-9 through -12.
2	The sampling activity protocols are vague. For example, according to DOE, four samples will be collected from four equally spaced locations around the sump; these samples will be collected from a depth of 0 to 12 feet and analyzed in 1-foot segments. The RA work plan should indicate how samples will be collected, and how many samples will be analyzed for each segment. The current approach suggests that up to 12 segments may be analyzed for each sampling point. If field screening will be used to limit the number of analyses, the decision criteria should be discussed and the minimum number of samples identified.	See response to General Comment No. 1 above. The collection of samples around the sump perimeter will be clarified and described in more detail in Section 6.2.2. In addition, the nature and application of screening criteria from Removal Action No. 17, Improved Storage and Handling of Soil and Debris, will be described in more detail. Affected pages: 6-8, 6-9 through -12.

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3	The information given throughout this workplan provides only a brief outline of the radiologic control measures which will be taken to assure worker exposures are maintained as low as reasonable achievable. In order for an accurate determination to be made of how well exposures will be controlled, more information should be provided. The workplan should include specific radiation protection measures for the entire sump removal sequence. Specific details should include time intervals between radiation surveys and the monitoring instrumentation and methods which will be used.	Information describing radiological control measures will be extracted from the Sump removal action safety assessment and incorporated into the Health and Safety Plan (RAWP Attachment 3). Affected pages: Attach. 3, 4-6, 6-3 through -5.
4	The attached Health and Safety Plan lists continuous air monitoring equipment for identifying airborne particulate material however, specific methods and procedures should be cited to assess the effectiveness of the respiratory protection program. Derived air concentrations should be provided and be directly applicable to this removal action.	Information describing radiological air monitoring and derived air concentrations will be extracted from the Sump removal action safety assessment and incorporated into the Health and Safety Plan (RAWP Attachment 3). In addition, the FEMP radiation worker bioassay monitoring program will be summarized. Affected pages: Attachment 3, 6-5.
	SPECIFIC COMMENTS	
1	Section 6.1.2, Page 6-4, Paragraph 2. The first sentence says that "the number of each type of sample is discussed in Section 3.0, Sampling Procedures." The correct reference is Section 6.2. However, Section 6.2 does not specify the number and type of each sample to be collected; it provides only a summary of the sampling procedures. Another section should be added that identifies the numbers of samples, types of samples, analytical parameters, and analytical methods.	This reference will be corrected to read Section 6.2. In addition, the numbers and types of samples and analyses will be clarified and described in new Table 6-4 (see response to general comment No. 1 above). Affected pages: 6-4, 6-8, 6-10 through -12.
2	Section 6.2.2, Page 6-6, Paragraph 3. The text indicates that samples will undergo Level D analysis. DOE should specify the associated analytical parameters, analytical methods, and method detection limits.	New Table 6-2 will be included describing the ASL D analytical procedures that will be applied to specific samples. Existing Table 6-2 will be renumbered 6-3. Method detection limits and related analytical parameters are detailed in the procedures and will be referenced. These tables will be referenced by new Table 6-4 (see response to general comment No. 1 above). Affected pages: 6-7, 6-10 through -12.

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3	Section 6.2.2, Page 6-7, Paragraph 1. As discussed in General Comment 2, DOE should specify how sampling of the perimeter of the sump pit will be conducted. The sampling protocol should be identified along with the anticipated number and type of samples, analytical parameters, and analytical methods.	See response to general comment No. 2 above. Affected pages: 6-8, 6-10 through -12.
4	Section 6.2.2, Page 6-7, Paragraph 2. The text indicates that samples will undergo Level C analysis for the target analytes. Table 6-2 indicates the analytical methods, but it is not possible to identify the difference between Level C and Level D analyses. The parameters and methods associated with Level C and Level D ASLs should be clearly identified.	The FEMP ASLs are defined in Attachment 2 to this RAWP. Their application in the Sump sampling will be clarified in Section 6. The ASL C and D analyses will be listed in separate tables (6-2 and 6-3) and referenced to the applicable samples in Table 6-4. Affected pages: 6-5, 6-7, 6-9 through -12.
5	Section 6.3, Page 6-8, Paragraph 1. The text references Table 6-2, but neither the text nor Table 6-2 sufficiently identifies the required analyses. For example, only one analytical method is cited for lead, yet the text identifies both ASL C and D analyses for lead. The number and types of samples to be collected should be identified by task and medium; at a minimum, the associated ASL and analytical method should be identified. Method detection limits should also be provided, perhaps in an attachment.	See responses to General Comments No. 1 and 2, and Specific Comment No. 4, above.
6	Section 2.0 Page 2-7 Para 2: Based on the information provided there is sufficient justification for the removal of this sump. However, there is insufficient information presented to justify not removing the inlet piping. Consideration should be given to removing the inlet piping, or justify why this removal will wait for the pilot plant demolition.	Additional information will be provided describing the layout of the floor drain piping beneath the Pilot Plant and the necessity of deferring its removal until the removal of the Pilot Plant. Figure 4-3 will be added showing the floor drain system layout. Affected pages: 2-11, 4-15, 4-17.
7	Section 2.1 Page 2-7 Para 1. More detail needs to be provided on the nature of by-products from past operations known to have occurred at the pilot plant in order to provide an accurate assessment of the sump contents, and the extent of contamination released to the environment. Justification should then be provided for the choice of contaminants of concern.	Additional information will be provided describing the operating history of the Pilot Plant and the nature of its by-products. Affected pages: 2-7 and -8.

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8	Section 2.1 Page 2-8 Para 2. The logic behind the sample selection methodology for soil and water samples should be articulated.	The text will be clarified to indicate that the soil and perched water samples discussed in this section were not specific to the sump but were associated with the characterization of OU-3 and, as such were collected in accordance with the OU-3 RI/FS objectives. Affected pages: 2-10.
9	Section 2.3 Page 2-9 Para 1. A copy of (SOP) 20-C-916 should be appended to this document and its provisions summarized for clarity.	Standard Operating Procedure SOP 20-C-916 will be incorporated into the RAWP as new Attachment 6. Affected pages: 2-12, Attachment 6.
10	Section 3.3.2 Page 3-2 Para 1. The definitive design documents should be reviewed along with this removal action workplan to provide a accurate assessment of removal strategies.	The definitive design documents, to be developed by the FEMP will be based on the approved approach and procedures described in this RAWP. Substantive deviations from the approach and procedures described in this RAWP will not occur without an attendant revision of the RAWP. The design drawings will be available for information if required. Affected pages: 3-3.
11	Section 4.2 Page 4-7 Para 3. This section indicates that there may be other sources that drain into the temporary sump. If there are other potential pathways for environmental contamination this should be articulated.	This text will be clarified to indicate 1) that there are no other known sources of process input to the Sump, and 2) the concentrated nature of the sump contents is believed to be an indication that there are no environmental inputs to the sump. Affected pages: 4-7 and -9.
12	Section 5.0 Page 5-1 Para 2. The text that states "Existing samples of the soils in the area indicate acceptable levels of both hazardous materials and radioactivity." Clarify what these acceptable levels are and how they are being applied.	This text will be clarified and the criteria presented in the Removal Action 17 work plan will be summarized. A summary of Removal Action 17 will be added to Section 2.3 of the RAWP. Affected pages: 2-12, 5-1.
13	Section 5.3 Page 5-2 Para 2. The provisions of Removal Action No. 12-Safe Shutdown Procedures and Protocols, should be summarized for clarity.	The provisions of Removal Action 12 will be summarized in Section 2.3 of this RAWP and SOP 20-C-916 will be added to new Attachment 6 to this RAWP. Affected pages: 2-12, 5-3.

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14	Section 5.5.4 Page 5-8 Para 1-3. The provisions of Removal Actions 17 & 9 should be summarized for clarity.	The provisions of Removal Actions 9 and 17 will be summarized in Section 2.3 of this RAWP. Affected pages: 2-12, 5-7.
15	Section 6.2.2 Page 6-7 Para 3. Soil background levels should be provided to clarify the radiological and chemical screening criteria.	The use of screening measurements to identify the maximum segment of each core will be clarified. Affected pages: 6-8.
16	Attachment 2 Page 1-6. Section 2.1 provides a summary of the perched water monitoring wells that soil samples were collected. from. Wells 1252, 1253, 1411, and 1504 are identified as part of the soil sampling scheme. Attachment 2 provides radiologic subsurface soil data for wells 1250, 1253, 1246, and 1411. It is unclear as to what wells subsurface soil samples ere actually taken from. No data is provided for wells 1252 and 1504. Data are provided for wells 1250 and 1246, however, these wells were not part of the stated sampling scheme. Clarify. Also, the depths at which soils samples were taken and the radiologic parameters that soils were analyzed for seem to vary between each well. Justification should be provided to clarify these inconsistencies.	The text in Section 2 of the RAWP will be clarified to indicate that the perched water samples discussed in this section were associated with the characterization of OU-3 and were collected in accordance with the OU-3 RI/FS objectives. No data are available for well 1504 and it will be deleted. The text will be clarified to indicate that for the 3 wells closest to the Sump, chemical data are available from well 1252, radiological from well 1253, and both chemical and radiological from well 1411. Affected pages: 2-9 and -10.
17	Attachment 3 Page 1-3. Radiologic data is not provided for perched water. Clarify if the perched water was analyzed for radiologic constituents.	Available radiological data will be summarized in Section 2 of the RAWP. Affected pages: 2-10.

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#	COMMENT	PROPOSED DISPOSITION
	GENERAL COMMENTS	
1	Due to the RCRA implications of this removal action and the requirements of RCRA closure not being met within this work plan, Ohio EPA can only accept a partial implementation of this work plan. Ohio EPA recommends DOE fully characterize the waste already removed from the sump. Additionally, DOE should remove any waste that has re-entered the sump and characterize it. Once the waste has been removed, the sump should be visually or remotely inspected to characterize the integrity of the tank. DOE should go forward with plans to remotely investigate the integrity of waste lines entering the tank. The removal action should be divided into two phases. The first phase should characterize: 1) the waste material which has been in and continues to enter the sump, 2) the integrity of the sump and waste lines, and 3) the potential source of additional contaminant flow. The second phase of the removal action will be based upon the results of the first. This phase could either lead to the removal of the sump while meeting RCRA closure requirements or the continued pumping of the sump as a collection vehicle until the source of contamination can be determined and remediated.	A. The RAWP will be revised to indicate that removal of the sump is an interim action required to define the source of contamination, remove as much as possible for source control, determine the extent of the system and attempt to determine if a release to the environment has occurred. Because the sump is a hazardous waste management unit (identified as the Abandoned Sump West of Pilot Plant), Closure Plan Information and Data will be submitted to OEPA on or before May 5, 1994, the original date provided OEPA in the August 1991 RCRA Compliance Schedule pursuant to Section II of the Proposed Amended Consent Decree between the state of Ohio and the DOE. However, it is not the intention to close this unit at this time. Removal of the sump is necessary to determine if the sump is still physically connected to the abandoned and covered drain system under the Pilot Plant. Should this be the case, the boundaries of the current unit may require redefinition. Additionally, removal of the sump may be necessary from a physical stand point to allow proper and complete exploration of the inlet drain line. Affected pages: ES-1, 1-1, 2-11, Attach. 5 page 1-1. B. <u>Characterization.</u> The sump contents are known, on the basis of existing sample results, to be a flammable and corrosive mixed radioactive hazardous waste, and the sump contents that have been removed to-date are being managed accordingly. As discussed in Sections 5 and 6 of the RAWP, additional characterization will be conducted during the removal action (full HSL), and as necessary following removal to facilitate treatment and final disposition of these materials. However, it is not necessary for the additional characterization to occur prior to removal of the sump. As such, the phased sequence of actions will be 1) remove remaining sump contents, 2) remove sump, 3) investigate sump and drain line integrity, 4) cap drain line, 5) backfill excavation, 6) fully characterize and disposition sump contents. The text will be clarified accordingly. Affected pages: 6-2, 6-6, 6-7.

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		C. Source of Contamination. The re-filling of the sump following initial pumping is consistent with the estimated volume of liquid contained in the sump and attached drain line. An evaluation of the initial liquid level elevation within the sump (576.5 ft msl), and the layout and elevation of the floor drain piping (579 ft msl and 574.5 ft msl starting and ending elevations respectively) resulted in an estimate of approximately 500 gal of liquids within the sump and attached drain line. The sump has been pumped during the weeks of July 20, September 2, and September 28, and a total of approximately 500 gal of liquids and suspended solids have been removed. Subsequent to the most recent pumping, the level in the sump has stabilized approximately 1.5 ft below the inlet drain line. As such, when the removal action is implemented, most if not all of the liquid in the sump and inlet line will be gone. The RAWP will be revised to incorporate these calculations. The source of contamination, and removal of liquids (if any) that may accumulate within the drain line following sump removal, will be addressed during final remediation of the Pilot Plant. Sections 2.3, 4.2, 4.5, and 4.8 will be clarified accordingly. Affected pages: 2-12.
2	In order for DOE to ensure adequate integration of RCRA and CERCLA at this site, it is essential that DOE send documents which contain Closure Plan Information and Data under a separate cover letter to the Director of OEPA. The district reviewer should be sent a copy of the plan. This parallel submittal will ensure that the Division of Hazardous Waste Management (DHWM) reviews these documents to ensure DOE's compliance with their RCRA requirements. Because DOE and Ohio EPA are still developing the integration of CERCLA and RCRA, the DHWM will not specifically comment on the adequateness of this document as a closure plan until such time as it meets the requirements stated in OAC 3745-66-11 (Closure Performance Standard).	See response A to General Comment No. 1 above. This RAWP/CPID will be forwarded directly to OEPA as indicated in this comment.

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	SPECIFIC COMMENTS	
1	Sec. 2, pg 2-7, para 2: The intent of this removal action is to abate a potential release of the sump's contents to the environment. The release is based on fluctuations of the liquid level in the sump. Attachment 1, pg. 2-3, states that the sump may not have been leaking during the sampling program. If the integrity of the sump has deteriorated to allow pathways for the liquid to escape then contamination from the sump should be constant. The fact that 500 gallons of liquid remain in the sump indicates that the leakage may be occurring from a different component of the system. If this is true, the sump may be serving as a collection point for the contaminants.	Section 2 will be clarified to indicate that there is no direct evidence of leakage from the Sump, but that the removal action is justified based on the threat of release posed by the sump. See response to general comment No. 1 above. Affected pages: Section 2.1, page 2-9.
2	Section 3.3.4, pg. 3-4, 3rd Paragraph: Provide a definition of "soil free of contamination" and reference it back to the Removal Action 17 Work Plan.	Text will be clarified to indicate that backfill soils will be obtained from within the OU-3, in accordance with criteria contained in Removal Action No. 17. Removal Action 17 will be summarized in Section 2.3. Affected pages: 2-13, 3-4.
3	Section 4.0: This section of the work plan should include a figure showing the floor drains within the Pilot Plant and their connection to the sump. This information is necessary to understand the source of waste which continues to enter the sump. Additionally, a figure needs to be included detailing the proposed area of soil excavation once the sump is removed.	A drawing showing the Pilot Plant floor drain system will be included and cited in Section 4.9 as Figure 4-3. Figure 4-2 will be revised to indicate the area of potential additional excavation around the Sump. Affected pages: 4-8, 4-15.
4	Section 4.1, pg. 4-7, 3rd Paragraph: Provide more specific references to SOP's or sections within RA #12 AND #17 which describe the methods to be used.	The SOP will be included as an Attachment to the RAWP. Affected pages: Attachment 6.
5	Sec. 4.2, pg. 4-7, Last Paragraph: DOE acknowledges the point that fluids may collect in the sump after the initial pump out. Laboratory analysis of the additional liquid, which may accumulate, would be beneficial for determining if high levels of contaminants exist in the area where the additional discharge is originating.	Collection of a sample from the sump prior to the initiation of removal activities will be incorporated into section 6. Full HSL screening analyses will be specified. See response to General Comment No. 1. Affected pages: 6-2, 6-6, 6-7.
6	Section 4.2, Figure 4-2: Why is the excavation area off-set from the sump? The excavation will encircle the entire sump according to the work plan.	Figure 4-2 will be revised to indicate the area of potential excavation around the Sump in addition to the currently indicated area of planned excavation around the drain line inlet. See response to specific comment No. 3. Affected pages: 4-8.

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7	Section 4.3: The rationale for removal of the sump is not quite clear if material continues to enter after pumping. If this is waste material where will it accumulate after the sump has been removed. The waste may back up into the drain lines and seep out into nearby soils creating additional mixed waste. It is essential to determine the source of the waste stream prior to sump removal.	See response to General Comment No. 1 above.
8	Section 4.4, pg. 4-10, Last Paragraph: DOE should include a copy of the referenced drawing within the work plan. See comment #2 above.	The drawing showing the Pilot Plant floor drain system will be included as Figure 4-3. See response to specific comment No. 3. Affected pages: 4-14, 4-15.
9	Sec. 4, pg. 4-11 para. 4: During the cleaning of the drain line, material pulled from the line will accumulate at the bottom of the sump. This seems to indicate that the material will be allowed to fall the 4'6" before reaching the bottom. To minimize aeration and/or splashing of this material, it should be captured at the mouth of the drain line.	Based on the nature of the material present within the sump, the distance from the sump bottom to the worker location, and the levels of personal protection and monitoring, this material is not anticipated to present additional hazards to workers or the environment.
10	Section 4.5, pg. 4-11, 5th Paragraph: Additional detail needs to be provided concerning the type of plug and method of attachment to be used for sealing the drain line.	Engineering specifications and a detailed description will be provided as Attachment 7.. Affected pages: 4-13, and Attachment 7.
11	Section 4, pg 4-13, Para. 5: DOE will monitor the lower explosive limit (LEL) in the sump to ensure it is at 0%. This percentage level may not be necessary or cost effective, therefore, DOE may want to reevaluate this.	This is an established FEMP procedure.
12	Section 4.9, pg. 4-14, Last Paragraph: The backfilling of the hole prior to the removal of all contaminated soil, as defined by RCRA, will likely result in the generation of additional hazardous or mixed wastes. Because listed hazardous wastes were contained in the sump, the soils need not fail TCLP to be hazardous. The mere presence of the listed constituents within the soil or debris associated with the sump removal will make these hazardous wastes. The fact that listed wastes were contained in the sump requires that the sump liquid waste be completely characterized (HSLs) as well as any waste associated with the removal.	Collection of a sample from the sump prior to the initiation of removal activities will be incorporated into section 6. Full HSL screening analyses will be specified for that sample as well as the soil samples collected from the bottom of the sump pit. See response to General Comment No. 1. Affected pages: 6-2, 6-6, 6-7.
13	Section 5: This section needs to incorporate a discussion of the additional waste, be it hazardous or mixed, which will likely be generated as the result of backfilling the hole prior to the removal of all contaminated soil.	Section 5 will be revised to indicate that because Sump contents include listed wastes, the backfill soils (160 ft^3) may be classified as hazardous/mixed wastes. Affected pages: 5-8.

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14	Section 5.5.2, pg. 5-6, 3rd Paragraph: It is not clear based upon review of the data within the RSE, what contaminants are present in concentrations high enough to result in a flash point of 118°F. Complete characterization of the liquid waste both that which remains and that which has been removed needs to be completed to answer such questions.	See response to General Comment No. 1 above.
15	Section 5.5.2, pg. 5-6, 4th Paragraph: The last sentence of this paragraph states that if the sump is refilling "the cause of the increase will be investigated before implementing this RAWP". At the August monthly project managers meeting Ohio EPA was informed that the sump is refilling. This work plan details no efforts to be taken under such circumstances. The work plan needs to be rewritten to address the current situation.	See response to General Comment No. 1 above.
16	Section 6.1.2, pg. 6-4, bullets: Would process knowledge of the Pilot Plant operations suggest that any reprocessing waste were used? Such wastes might have generated additional radionuclide contaminants (fission products).	Additional information describing the Pilot Plant background and operations will be provided. Further, collection of a sample from the sump prior to the initiation of removal activities will be incorporated into section 6. Full HSL screening analyses will be specified for that sample. Affected pages: 2-7.
17	Section 6.1.2, pg. 6-4, 1st Paragraph: a) Additional contaminants which failed TCLP must be included in the target analytes. These include benzene and mercury (See Attachment 6, Table 2-1). b) Basing target analytes solely on TCLP results will not be sufficient nor will the use of only three organic analytes. The fact that listed wastes were discharged to the sump requires that a broader range of organic constituents be analyzed. These analyses will be required to determine the RCRA status of soils associated with the sump.	a. The additional contaminants will be incorporated to be consistent with Attachment 5, Table 2-1. Affected pages: 6-4, 6-9. b. Additional HSL screening will be included in Section 6.1.2 and Table 6-2. Affected pages: 6-6, 6-7.
18	Attachment 1, pg. 1-1, para. 4 & pg 1-7, Fig 1-3: Several references to the sump's dimension list it as being 11' x 4' dia. while other entries list it as being 9'x 2' dia. DOE needs to verify the dimension and check the calculations used to determine the weights and quantities involved with this project.	These inconsistencies will be corrected as follows: 1. Sump dimensions - page 1-1, paragraph 2, line 5. "The temporary sump is 9 ft. long by 2 ft. in diameter...". 2. Soil dimensions - page 1-1, paragraph 4, line 5. "(the 4 ft. diameter, 11 ft. deep cylinder of contamination encompassing the sump...)"

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19	Attachment 5, Table 2-1: a) The table fails to note that barium also failed TCLP. b) The table fails to include tetrachloroethylene, which was detected in the sump liquid (See Attachment 1, VOC results).	a. A footnote "2" will be added to Table 2-1 for barium. Page 2-3, Attachment 5. b. Tetrachloroethylene will be added to Table 2-1, page 2-3, Attachment 5.
20	Attachment 3, Section 5.12: States that no confined space work is anticipated. The document, however, indicates several tasks which seem to occur inside the sump. By definition the sump is a confined space and therefore the requirements of confined space entry will need to be followed.	As stated, there will be no confined space entry. There will be no work activities requiring entry of the sump. Work activities will be conducted from locations outside the sump.
21	Attachment 5, Section 6.0, Last Sentence: The last sentence needs to be reworded to state that DOE is required to comply with ARARs unless determined otherwise by OEPA and USEPA. As written it suggests compliance only when specifically determined by the agencies.	The sentence will be reworded to state "DOE will comply with ARARs unless determined otherwise by the OEPA and USEPA pursuant to the Consent Agreement and Consent Decree signed by the parties." Affected pages: Attachment 5, 6-1.