

**3965**

**APPROVAL OF REMOVAL ACTION 24 PILOT  
PLANT SUMP WORK PLAN**

**11/19/92**

**USEPA/DOE-FN  
2  
LETTER**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

LOG FILE LIBRARY  
4-00789  
AR

Nov 24 9 48 AM '92

3965

NOV 19 1992

R-031-207.4



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 24  
Pilot Plant Sump 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 24 Pilot Plant Sump Work Plan. The revised Work Plan adequately addresses the majority of U.S. EPA's comments.

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

REC'D  
DEC - 1 1992  
ASI  
FERNALD

(Janke(RJ))  
Partial Action  
Response to  
DOE-0106-93  
(5244)

1

REVISED PILOT PLANT SUMP  
REMOVAL ACTION WORK PLAN  
TECHNICAL COMMENTS

3965

GENERAL COMMENTS

- 1) The revised removal action (RA) work plan has been substantially revised to address U. S. Environmental Protection Agency (EPA) comments. The approach presented in the revised work plan is to remove the tank; cap any connecting piping; conduct sampling of subsurface soils and residual sump contents; remove a limited amount of contaminated soil; internally inspect pilot plant drain lines; and integrate any study of residual contamination of subsurface soil and ground water into the operable unit (OU) 5 remedial investigation and feasibility study (RI/FS). Although this approach may be sound, the revised work plan does not provide for any EPA input should the RA identify sump-related contamination outside the scope of the revised RA work plan. After this phase of the RA is implemented, the U.S. Department of Energy (DOE) should submit a report to EPA that allows the agency to evaluate whether further remediation is necessary under this RA.

SPECIFIC COMMENTS

1. Section 3.4, Page 3-5, Paragraph 3. This section and Table 3-1 do not include a final report. DOE should include a final report that will require approval by EPA. Also, the text should indicate that further phases of activity are possible under the RA, depending on EPA's evaluation of the final report.
2. Table 6-4, Page 6-10. Table 6-4 incorrectly references Table 6-3 for the analytical procedure. The reference should be to Table 6-2.