

4072

**APPROVAL OF EE/CA FOR REMOVAL ACTION**  
**27**

01/14/93

**USEPA/DOE-FN**  
**2**  
**LETTER**



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

Original File Copy

4072

6-011673  
 AR

JAN 14 1993

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 EE/CA for  
 Removal Action 27

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) Engineering Evaluation and Cost Analysis (EE/CA) for the Management of Contaminated Structures, Removal Action 27. The EE/CA screens seven alternatives intended to minimize potential risks and accelerate the cleanup at 25 contaminated structures in Operable Unit #3.

U.S. EPA concurs with the selection of decontamination and decommissioning as the preferred alternative. Therefore U.S. EPA hereby approves the EE/CA pending incorporation of the attached 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
- Nick Kauffman, FERMCO
- Jim Theising, FERMCO
- Paul Clay, FERMCO

(JANKE(RJ))  
 ACTION RESPONSE  
 TO DOE-0616-93  
 (5463)

## TECHNICAL REVIEW COMMENTS

4072

### Engineering Evaluation/Cost Analysis for Removal Action No. 27, Management of Contaminated Structures

#### GENERAL COMMENTS

1. The relationships between Removal Action No. 27 and other key removal actions, including No. 9 (removal of waste inventories), No. 12 (safe shutdown), No. 17 (improved storage of soil and debris), and No. 26 (asbestos abatement program) should be explained in work plans to be submitted for Removal Action No. 27.
2. The action-specific applicable or relevant and appropriate requirements (ARAR) should include the Occupational Safety and Health Administration (OSHA) standards for construction (29 CFR Part 1926).
3. The work plan for Plant No. 7 and the fire training facilities (73A through E) might not contain the analytical results from the OU3 RI; DOE should assure that field sampling and analysis plans are sufficient to support the D&D effort.

#### SPECIFIC COMMENTS

1. Section 2.4, Page 37, Paragraph 2: The work plan for each group of structures scheduled for D&D should indicate whether contamination levels have been reduced by the ongoing Removal Action No. 12, safe shutdown.
2. Section 2.5.2, Page 60, Paragraph 1: The work plans for Removal Action No. 27 should identify structures of questionable structural integrity and the safety measures that will be taken to avoid potential risks to workers.
3. Section 3.6.1, Page 67, Paragraph 4: Six (6) RCRA hazardous waste management units will be closed under Removal Action No. 27. DOE should indicate that the RCRA actions will be consistent with the final remedy for OU3.
4. Appendix B, Table B-3: The potential action-specific requirements should include the OSHA standards for D&D (20 CFR Parts 1910 and 1926).