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**APPROVAL OF OU5 INITIAL SCREENING OF  
ALTERNATIVES**

**01/14/93**

**EPA/DOE-FN**

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**LETTER**



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

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JAN 14 1993

G-01677  
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REPLY TO THE ATTENTION OF:

JAN 14 1993

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 OU #5 Initial  
Screening of Alternatives

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Operable Unit (OU) 5 Initial Screening of Alternatives (ISA). The ISA is complete and addresses all requirements of applicable guidance documents.

Therefore U.S. EPA approves the ISA pending incorporation of the attached minor comments.

Please contact me at (312) 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

(VEROLE)  
ACTION RESPONSE  
to DOE-0331-93  
(54105)

U.S. EPA GENERAL COMMENTS ON THE OU #5 ISA

Although none of the general comments will require DOE to revise the ISA, there are several items that will need DOE's attention in the future as they progress through the Feasibility Study stage.

- 1) The ISA does not discuss which of the potential ARARs would relate to which of the alternatives examined. In the Feasibility Study, we will expect DOE to correlate to each remedial alternative, the ARARs that may apply to it. As the ISA is written, it is unclear which of the array of potential ARARs from the listing in Appendix B would apply to which of the various alternatives.
- 2) In the Feasibility Study EPA expects greater specificity from DOE as to which particular requirements may be ARARs. For example, in Appendix B of the ISA, DOE correctly identifies as a Chemical-Specific ARAR the Resource Conservation and Recovery Act and 40 CFR 260-272. While it is certainly the case that RCRA is a potential ARAR, compliance with all of the RCRA requirements will not be required of OU5. At the Feasibility Study stage, we will expect DOE to be more precise about which particular aspects of RCRA and the RCRA regulations should be considered as potential ARARs. This can be accomplished by listing in Appendix B the specific statutory sections or regulation citations that may be ARARs, and by expanding the narrative "Description" section of Appendix B to clarify why a particular requirement may be an ARAR. Such an expanded narrative description would be particularly helpful to us for statutes and regulations with which we are less familiar.

## SPECIFIC TECHNICAL COMMENTS

1. **Page 6-10, Line 22:** The text indicates that a total of 12 wells will be used for reinjecting treated ground-water into the aquifer. However, considering the maximum injection pressure of less than 1 pound per square inch per foot of overburden above the injection level, more than 12 wells may be required to reinject 500 gallons per minute of ground water. The U.S. Department of Energy (DOE) should check the proposed number of reinjection wells and increase their number if needed.
  
2. **Page: 6-10, Lines 26, 27, and 28:** The text indicates that the treatment sludge will have concentrated contaminants and will be stored at an on- or off-site storage facility for 10 years. DOE should clarify in the text that an on-site storage facility will be considered a long-term storage facility under the Resource Conservation and Recovery Act (RCRA) and will have to comply with substantive RCRA permitting requirements.