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EE/CA WASTE PITS - #2 U.S. DOE FERNALD OH6 008 976

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LETTER

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HR-12

SEP 11 1990

FACSIMILE
FEDERAL EXPRESS

Mr. Bobby Davis
U.S. Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

RE: EE/CA Waste Pits - #2
U.S. DOE Fernald
OH6 890 008 976

Dear Mr. Davis:

On February 2, 1990, the United States Department of Energy (U.S. DOE) submitted a preliminary version of a draft Engineering Evaluation/Cost Analysis (EE/CA) for a removal action (#2) for the control of contaminated storm run-off in the waste pit area of the Feed Materials Production Center (FMPC) site in Fernald, Ohio. The United States Environmental Protection Agency (U.S. EPA) provided comments on this preliminary draft on May 1, 1990, in order to provide guidance for the development of the draft that was submitted to U.S. EPA on May 30, 1990. U.S. EPA disapproved the May 30, 1990 draft EE/CA on July 2, 1990 and U.S. DOE submitted a revised EE/CA dated August 10, 1990.

The EE/CA proposes a practical response action to eliminating the discharge of contaminated storm water runoff to Paddys Run. While the concept of collection and treatment is sound in principle it is not clearly presented how the contaminated storm water will be treated. It appears that the proposed treatment is yet another variation of the "treatment of equivalent mass" concept originally proposed for the south plume EE/CA.

U.S. EPA is approving this EE/CA with the following modifications:

Additional information must be provided in the work plan to address the following issues.

1. The pilot plant is described as operating at 10 gallons per minute (gpm); however, the average annual rainfall contribution will be 23 gpm. If the pilot plant is to treat intended to treat an equivalent mass of uranium additional information should be provided to explain this discrepancy.

2. The response to comment 55 from the July 2, 1990, U.S. EPA disapproval states that, "storm water runoff will continue to contribute uranium to

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the Great Miami River." The sources of uranium, total mass of uranium released to the Great Miami River, and anticipated mass of uranium removed by treatment should be provided.

3. Provide an explanation why it is necessary to combine several flows into the biodenitrification surge lagoon (BSL) prior to routing only a small fraction of this combined waste water to the pilot plant. In addition, the uranium concentrations for all flows into the BSL should be provided.

4. Information should be provided to explain why the storm water runoff is not being treated independently of the other waste streams being combined in the BSL.

5. Provide an explanation why only storm water that exceed the 550 pCi/L limit is collected from the waste pit area when future allowable discharge limits may be set at concentrations lower than that currently allowed.

The above information must be provided in the removal #2 work plan, which is required to be submitted within thirty (30) days of the date of this letter.

Please contact me at (312 or FTS) 886-4436 if there are any questions.

Sincerely,

Catherine A. McCord

Catherine A. McCord
Remedial Project Manager

cc: Richard Shank, OEPA
Graham Mitchell, OEPA-SWDO
Leo Duffy, U.S. DOE - HDQ
Joe LaGrone, U.S. DOE - ORO