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**OPERABLE UNIT 1 COMPREHENSIVE
RESPONSE ACTION RISK EVALUATION
REVISION**

10/28/93

**DOE-0207-94
DOE-FN/EPA
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LETTER**



Department of Energy
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DOE-0207-94

James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V - 5HRE-8J
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Graham E. Mitchell, Project Manager
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402-2086

Dear Mr. Saric and Mr. Mitchell,

**OPERABLE UNIT 1 COMPREHENSIVE RESPONSE ACTION RISK EVALUATION
REVISION**

Reference: Letter from J. R. Craig to J. A. Saric, "Initial Screening Results for Operable Unit 1 Feasibility Study," dated September 23, 1993.

The United States Department of Energy (U.S.DOE) is proposing to exclude the Operable Unit 1 (OU1) Comprehensive Response Action Risk Evaluation (CRARE) as an attachment to the OU1 Feasibility Study (FS), as discussed at the October 13, 1993 meeting between the U.S.DOE, The United States Environmental Protection Agency (U.S.EPA), Ohio Environmental Protection Agency (OEPA), and Fernald Environmental Restoration Management Corporation (FERMCO). U.S.DOE believes that because of the Leading Remedial Alternative (LRA) for OU1, as identified in the Site-Wide Characterization Report (SWCR), is expected to have no significant modifications as a result of the FS process, there is little advantage to revising the CRARE that accompanied the Operable Unit 4 (OU4) FS.

The potential modifications to the OU1 LRA have been documented in both meetings and letters from U.S.DOE to U.S.EPA in the last six months (above referenced letter DOE-3083-93). The level of detail now available in the OU1 RI, which was submitted to U.S.EPA on October 6, 1993, and the current information available for use in the FS clearly indicates the similarity between the OU1 LRA and the most likely alternatives being carried forward in the detailed analysis portion of the FS. The only change to the OU1 LRA

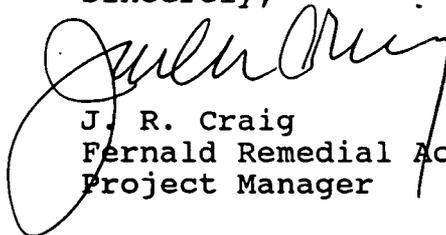
currently anticipated, involves the final disposition of the waste pit materials that are excavated. The current information indicates that the change would be the consideration of off-site disposal which would further reduce the site-wide risk contribution. Based on the fact that there would be little or no additional risk information that could benefit the decision process for OU1, the U.S.DOE feels that a revised CRARE attached to the OU1 FS is not warranted.

Rather than the revised CRARE being submitted with the OU1 FS there will be increased emphasis placed on the CRARE that accompanies Operable Unit 2 (OU2) FS. Since OU2 still retains a wide array of alternatives for each of the waste units, the complexity of the CRARE, for use in the progress towards actual site-wide risk reduction, will be increased. In addition, since the OU1 and OU2 FS reports will be available for U.S.EPA review within the same time frame, the proposal to not include a CRARE in OU1 in no way compromises or reduces the effectiveness of the site-wide risk information.

The U.S.DOE will include, as an attachment to the OU1 FS, a quantitative description of the potential changes to the OU1 LRA and the impact on the ability to address site-wide risk in the evaluation of response actions. The CRARE submitted with the OU2 FS will also address all of the U.S.EPA comments as a result of the OU4 FS/CRARE submittal. The document change request, required to amend the RI/FS Work Plan, will accompany the planned revision to the Risk Assessment Work Plan Addendum due early in 1994. The U.S.DOE, however requests that the U.S.EPA provide preliminary concurrence on this proposal to allow resource re-allocations and scheduling modifications of both OU1 and OU2 projects to proceed.

If you or your staff have any questions regarding this matter, please contact Mr. Randy C. Janke, of my staff, at (513) 648-3123.

Sincerely,



J. R. Craig
Fernald Remedial Action
Project Manager

FN:R.C.Janke

cc:

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