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**OPERABLE UNIT 1 DRAFT FEASIBILITY STUDY
REPORT/PROPOSED PLAN - ENVIRONMENTAL
ASSESSMENT REF: 5286, 5287, 5288 AND 5289**

03/03/94

**DOE-1146-94
DOE-FN/EPA
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LETTER
OU1**



Department of Energy
Fernald Environmental Management Project
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MAR 03 1994
DOE-1146-94

Mr. James Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V - 5HRE-8J
77 W. Jackson Boulevard
Chicago, IL 60606-3590

Mr. Graham Mitchell, Project Director
Ohio Environmental Protection Agency
40 South Main Street
Dayton, OH 45402-2085

Dear Mr. Saric and Mr. Mitchell:

OPERABLE UNIT 1 DRAFT FEASIBILITY STUDY REPORT/PROPOSED PLAN - ENVIRONMENTAL ASSESSMENT

This letter transmits the Fernald Environmental Management Project (FEMP) Operable Unit 1 (OU1) Draft Feasibility Study Report/Proposed Plan - Environmental Assessment (FS/PP-EA) for your review and approval. This draft primary document is subject to a sixty (60) day review and comment period in accordance with the Amended Consent Agreement.

We are cognizant of the conclusions reached in the February 24, 1994, meeting, requiring additional clarifications in FEMP Remedial Investigation/Feasibility Study documents with respect to: expanded trespasser exposure scenarios; continued Federal ownership of the site; calculated risks from PAHs; et al. However, in understanding the timing of the preparation/submittal of the OU1 FS as well as of the ongoing reviews by EPA of the OU1 and OU2 RI Reports, it was agreed in the February 24th meeting, that supporting explanations for these topics will be provided for - as change pages - separate from the document turnout. The conclusions and agreements resulting from that meeting will be identified and discussed in much more detail in a forthcoming letter.

It is also prudent to advise that 10 CFR 61 is not identified as an applicable or relevant and appropriate requirement (ARAR) for OU1. This is contrary to what was identified in the January 19, 1994, ARAR meeting, wherein, differences between ARAR identification in the OU4 FS Report and those for the OU1 FS document were noted. Since that meeting, further review of ARARs in light of the differences between remediation of OU1 and OU4, and Department of Energy (DOE) Headquarters policy, indicated that 10 CFR 61 should not be

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identified as an ARAR in the OUI FS/PP-EA. Thorough text describing the inter-relationship between DOE Order 5820.2A and 10 CFR 61 has been placed in the ARAR Appendix F (pages F-1-2 and F-1-3).

Please contact Dave Lojek at 513-648-3127 should you have any questions or require further clarification regarding the OUI Draft FS/PP-EA Report.

Sincerely,



for

Jack R. Craig
Fernald Remedial Action
Project Manager

FN:Lojek

Enclosure: As Stated

cc w/enc:

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