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U-005-305 .20

**APPROVAL OF OU 3 RI/FS WORK PLAN AND SCHEDULE  
MODIFICATIONS**

09/26/94

USEPA            DOE-FN  
3  
COMMENTS



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FERNALD

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

H: 05961

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 23 12 52 PM '94

FILE:

REPLY TO THE ATTENTION OF:

SEP 26 1994

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 3  
RI/FS Work Plan and  
Schedule Modifications

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) Modification of the Operable Unit (OU) 3 Remedial Investigation/Feasibility Study (RI/FS) Work Plan Addendum and Schedule. The Addendum proposes a reduction of the number of collected samples, submittal of a combined RI, FS, and Proposed Plan (PP) document, and acceleration of the 1991 Amended Consent Agreement (ACA) Record of Decision (ROD) date by over nine months.

U.S. EPA approves the submittal of one RI/FS/PP document, the acceleration of the ROD schedule, and the workplan addendum. However, there are a few comments concerning the modifications to the sampling program, which are attached. U.S. DOE must revise the workplan incorporating the attached comments within thirty (30) days receipt of this letter.

U.S. EPA will forward a separate ACA change document to reflect the revised OU 3 schedules.

*1 (attached)  
Partial  
ACTION RESPONSE  
to R-0041*

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Please contact me at (312) 886-0992 if you have any questions.

Sincerely,



James A. Saric  
Remedial Project Manager  
Technical Enforcement Section #1  
RCRA Enforcement Branch

Enclosure

cc: Tom Schneider, OEPA-SWDO  
Jack Baublitz, U.S. DOE-HDQ  
Don Ofte, FERMCO  
Jim Thiesing, FERMCO  
Paul Clay, FERMCO

## U.S. EPA COMMENTS ON THE OU 3 RI/FS WORK PLAN ADDENDUM

Page 7, Section 3.4: Provide justification as to the use of the 20 X Toxicity Characteristic Leaching Procedure (TCLP) value as that used to drive remedial decisions relating to metals.

Page 20, Section 4.3: The revised approach to the OU 3 Feasibility Study indicates that treatment options for both on-site and off-site disposal will be eliminated since the major decision to be made in OU 3 is on-property versus off-property disposal. U.S. EPA disagrees with this justification and believes that treatment options must be discussed in more detail during the detailed analysis of alternatives in the FS. Treatment should be used whenever possible to reduce toxicity and mobility of the waste materials regardless of the disposal options.

Table 2B: This table is not consisted with the associated text in the document.