6167 U-005-455 .1

DISAPPROVAL OF THE OU 3 RD/RA WORK PLAN AND BUILDING 4A IMPLEMENTATION PLAN

11/08/94

USEPA DOE-FN
6
DISAPPROVAL

6167 -

FERNALD
OCI-0421

NOV 10 2 31 PM '94

FILE:

REPLY TO THE ATTENTION OF:

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

NOV 0 8 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: Disapproval of the OU 3 RD/RA Work Plan and Building 4A Implementation Plan

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Operable Unit (OU) 3 Remedial Design (RD)/Remedial Action (RA) Work Plan and Building 4A Implementation Plan. The RD/RA work plan provides a strategy for prioritizing buildings for decontamination and dismantling; coordination of OU 3 activities with other OUs; a sampling and analysis plan; a construction quality assurance plan; an operation and maintenance plan; and a health and safety plan. The building 4A Implementation Plan provides estimates of the materials to be stored or disposed from Building 4A.

The major deficiency in the RD/RA workplan is the lack of waste acceptance criteria for disposal, recycling, reuse, or free-release of materials. This criteria must be established to minimize material handling and to facilitate material segregation and disposition.

The major deficiency in the Building 4A Implementation Plan is the lack of conceptual drawings. Without the conceptual drawings it is difficult to present meaningful comments.

Therefore, U.S. EPA disapproves the OU 3 RD/RA Work Plan and Building 4A Implementation Plan pending incorporation of the attached comments.

The United States Department of Energy must incorporate the comments into the work plan and implementation plan, and submit revised documents to U.S. EPA within thirty (30) days receipt of this letter.

(Shan(A)
Inhram
to R-0033
(8349)

100000

Printed on Recycled Paper

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

TECHNICAL REVIEW COMMENTS ON THE DRAFT OPERABLE UNIT 3 REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN FOR INTERIM REMEDIAL ACTION AND BUILDING 4A IMPLEMENTATION PLAN

GENERAL COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA
Original General Comment #: 1
Comment: The materials management strategy should be clearly linked to the storage and disposition of material generated from dismantlement activities (primary materials) without including the wastes generated during the remediation activities (secondary materials). The management of primary materials should be the responsibility of the Department of Energy (DOE). The secondary materials management should be the responsibility of the remediation subcontractor because the type and amount of secondary material generated will depend on the methods of dismantlement and decontamination used by the subcontractor.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA
Original General Comment #: 2
Comment: The interim remedial action (RA) is primarily related to the dismantling of structures that have been subjected to inventory removal and safe shutdown. Therefore, the sampling and analysis program should be directed toward the disposition of material instead of soil and water sampling. Selecting disposal facilities that can handle the material that will not be shipped to the Nevada Test Site and establishing waste acceptance criteria for these facilities will streamline the sampling and analysis program. This effort will reduce the time and money required for completing the interim RA, and should be completed prior to initiating the interim RA.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA
Original General Comment #: 3
Comment: Coordination between operable unit (OU) 3 and OU5 should focus on the material generated during dismantlement at and below grade. Because contaminated soil and groundwater will be the focus of OU5 activities, the environmental monitoring program for OU3 should describe the monitoring of air emissions and water quality resulting from decontamination of structures and equipment.

SPECIFIC COMMENTS - VOLUME 1

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.3.6 Page #: 3-27 Line #: 12 to 17
Original Specific Comment #: 1
Comment: The use of shape charge demolition is mentioned for buildings that cannot be safely dismantled using conventional dismantling and demolition techniques. The potential for misfires and the dangers associated with the use of explosives in buildings located in close proximity to other structures should be carefully considered in selecting and using this method of demolition.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.4.1.4 Page #: 3-37 Line #: 15 to 20
Original Specific Comment #: 2
Comment: The text states that material segregation categories are based on the ultimate disposition of the debris or waste materials. The waste acceptance criteria for nonhazardous waste and hazardous waste landfills, and criteria for recycling, reuse, or free-release should be established and form the basis for material segregation.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.5.2 Page #: 3-44 Line #: 14 to 16
Original Specific Comment #: 3
Comment: The text states that the OU3 final RA will address the treatment and disposition of materials and may therefore, impact the performance of decontamination and dismantlement activities. The work plan should clearly identify the schedule and scope of the OU3 final RA, and how it relates to OU5 activities and the OU3 interim RA. Impacts of the OU3 final RA on the performance of decontamination and dismantlement activities should be detailed.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.7.1.2 Page #: 3-61 Line #: 12 to 14
Original Specific Comment #: 4
Comment: The text states that if a contaminant release or activity occurs, then OU5 personnel and other appropriate divisions will be alerted immediately. The sampling and analysis to be conducted by OU5 personnel and its relation to the OU3 sampling and analysis program should be described or referenced.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 4.5 Page #: 4-5 Line #: 9 to 15
Original Specific Comment #: 5
Comment: The remedial design tasks involve a low degree of uncertainty because inventory removal and safe shutdown activities will have been completed. Therefore, the intermediate design task may not be necessary for many

buildings or structures. The preliminary design should be submitted to the regulatory agencies for review, and based on the review comments, a prefinal design can be prepared. The prefinal design should contain the implementation plan.

VOLUME 2

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.2.1 Page #: 2-10 Line #: 1 to 5
Original Specific Comment #: 6
Comment: The text states that the proposed sampling program outlined in this document along with process knowledge and other available information is believed to be sufficient to ensure effective segregation of materials. The goal of the OU3 interim RA should be to maximize recycling, reuse, or free-release of recoverable materials, and to minimize on-site storage of nonrecoverable materials. Hence, waste acceptance criteria for off-site disposal and criteria for recycling, reuse or free-release should be the basis of the sampling program.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.4 Page #: 3-17 Line #: 17 and 18
Original Specific Comment #: 7
Comment: The text states that the discussion focuses on the ability to use existing environmental monitoring programs to support sampling needs. The data for safe shutdown activities is not discussed. This data could be valuable in planning the air monitoring program, and building or structure-specific health and safety plans. The background soils, surface water, and groundwater data from other OU activities will be valuable in planning site-specific environmental monitoring programs to handle accidental releases during decontamination and dismantlement activities. Therefore, the manner in which the data from existing environmental monitoring programs will be used to support the OU3 interim RA sampling needs should be discussed.

CONSTRUCTION QUALITY ASSURANCE PLAN

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.1 Page #: 2 Line #: 7 to 9
Original Specific Comment #: 8
Comment: The description of the organizational structure and functional responsibilities would be significantly clarified by an organization chart. The chart should show the interaction with the regulatory agencies, and the interface between engineering, construction, quality assurance, and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Resource Conservation and Recovery Act (RCRA) units (CRU). Responsibility for actions

required to correct deficiencies observed during inspections should also be clarified.

BUILDING 4A IMPLEMENTATION PLAN
SEPTEMBER 1994

GENERAL COMMENT

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA
Original General Comment #: 1
Comment: The implementation plan describes the materials expected to be generated by the decontamination and dismantling of Building 4A. However, the preliminary design drawings should be presented in order for the U.S. Environmental Protection Agency (EPA) to provide meaningful comments. In addition, the prefinal design drawings and specifications should be submitted for EPA review.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA
Original General Comment #: 2
Comment: The material segregation categories are described in detail. The material disposition is, however, not specified. DOE should provide waste acceptance criteria for the categories of materials specified in the document, and should detail the volumes of materials that will be disposed of off site or that will be retained on site for reuse, recycling, or future disposal.