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**DRAFT REMOVAL SITE EVALUATION - LAUNDRY SUMP UPGRADE
PROJECT**

07/13/94

DOE-2020-94
DOE-FN FERMCO
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RSE RESPONSE



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Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6357

JUL 13 1994

DOE-2020-94

Mr. Dave Brettschneider
Fernald Environmental Restoration
Management Corporation
P.O. Box 398704
Cincinnati, Ohio 45239-8704

Dear Mr. Brettschneider:

DRAFT REMOVAL SITE EVALUATION - LAUNDRY SUMP UPGRADE PROJECT

The subject Draft Removal Site Evaluation (RSE) has been reviewed by my office, and the Department of Energy, Fernald Field Office (DOE-FN) comments are listed below. The RSE was prepared for this project under the authority of the DOE as lead agency in accordance with Subpart B of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This RSE identifies the sources and the nature of releases or threat of releases, that may result from this project and evaluates the magnitude of the threat to human health and the environment. Based on review of this RSE and an evaluation of the factors to be considered under the NCP (§300.415), DOE has determined that this project does not cause initiation of a removal action.

Soil and debris associated with this project should be managed in accordance with the control measures noted within the RSE document and per the guidelines specified in the Fernald Environmental Management Project (FEMP) Site Policy and Procedures and Removal Action Number 17. Furthermore, this RSE shall be submitted to the Administrative Record for the RI/FS. Please change the document to incorporate DOE-FN comments before putting it in the Administrative Record. Please provide DOE-FN with a copy of the final document.

Comments

- 1) Section 300.410 of the NCP states that "A removal site evaluation (RSE) includes a removal preliminary assessment and, if warranted, a removal site inspection." The subject RSE should make a statement about whether or not a removal site inspection was conducted for this project.

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- 2) The RSE contained surface soils data but since soils will be excavated to approximately ten feet for the sump, the RSE should have soil data at depth. The OU5 RI indicates that there are high levels of contamination (50 to 1000 ug/g) in the near surface soils (0.5 to 1.0 foot) in the vicinity of the project. The RSE should examine this data to determine if it is an issue for the project. The proximity of the contamination may be just an artifact of the imprecise data contouring in the RI. Data from soil borings done for the RI should be a readily available source of information for the RSE.
- 3) The following factor should be considered to determine the appropriateness of a removal action.
- 40 CFR 300.415 (b) (2) (iv)
- High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.
- The need to consider this factor should be based on information readily available from the OU5 RI as noted in comment #2.
- 4) Perched ground water has been encountered at depths as little as three feet at the FEMP. Please briefly describe how water will be handled if a perched water zone is encountered during the project.
- 5) Introduction, Paragraph 4: For clarification, explain the source of increased contamination levels discovered in tire ruts in the area. Why was the area reduced from a "contamination area" to a "controlled area"? In Attachment 2 it is not clear what part of the survey incorporated the tire ruts. Please clarify.
- 6) Source Term, Paragraph 3: Soil contamination may be a result of past airborne activity from the production facility. Or, if the lockers are the source (as is indicated in the text) it is probably from runoff of these contaminated units.
- 7) Introduction, Paragraphs 2 and 4: The 700 cubic feet of soil referenced seems excessive. The text states that a 4'X6'X9' pit will be excavated and piping will be constructed overhead. Please clarify.
- 8) Evaluation of the Magnitude of the Potential Threat: Please add a brief discussion based on readily available information about the potential contaminated media and the apparent level of contamination.

If you or your staff have any questions please contact John Stover at (513) 648-3185.

Sincerely,

Johnny Rensing

for

Jack R. Craig
Assistant Manager for
Environmental Restoration

FN:Stover

cc:

R. Allen, DOE-FN
J. Golden, FERMCO