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U-005-455.7

OU3 PSR - CONDITIONAL APPROVAL

07/14/95

OEPA DOE-FN
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COMMENTS



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

July 14, 1995

RE: DOE FEMP
MSL #531-0297
OU3 PSR -
CONDITIONAL APPROVAL

Mr. Jack Craig
Director
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, OH 45329-8705

Dear Mr. Craig:

This letter provides Ohio EPA's conditional approval of DOE's June 12, 1995 submittal, "Operable Unit 3 Remedial Design Prioritization and Sequencing Report." The condition for Ohio EPA approval is acceptable resolution of the following comment:

1.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code: C
Original Comment #: 4 and 6

Comment: The Ohio EPA is frustrated with DOE's resistance to re-prioritize the Pilot Plant Complex for D&D. In the past, the Pilot Plant Complex was ear marked as a priority, one of three packages to have been submitted with the draft RD WP. While prioritizing other buildings for D&D activities to support the on-site disposal facility and OU5 soils remediation is a desirable goal, the Pilot Plant Complex is perhaps one of the worst contaminated areas within the FEMP production area. The soils underlying the Pilot Plant are likely to contain RCRA listed constituents and potentially characteristic wastes which need to be addressed. The soils and piping underlying the Pilot Plant are continuing to act as a source of contamination to groundwater as demonstrated by the Pilot Plant Sump Removal Action. Ohio EPA believes it is prudent for DOE to prioritize removal of the Pilot Plant Complex to allow OU5 access to this soil. Having these buildings out of the way early on will allow more time to address the substantial level of contamination expected below the Pilot Plant. The Ohio EPA recommends that the Pilot Plant Complex be re-evaluated and given a higher priority for removal. Expediting the Pilot Plant Complex will be even more important as DOE pursues the Ten-Year remediation approach.

Response:
Action:

PSRFIN.CAP

Mr. Jack Craig
July 14, 1995
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Ohio EPA is available to discuss resolution of this issue concerning re-prioritization of the Pilot Plant Complex. If you should have any questions, please contact Tim Hull at (513) 285-6075 or me.

Sincerely,



Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Lisa August, GeoTrans
Jim Saric, U.S. EPA
Terry Hagen, FERMCO
Ruth Vandegrift, ODH
Manager TPSS, DERR
Sharon McLellan, PRC