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U-005-305.24

**DISAPPROVAL OF OU3 RI, FS AND PP DOCUMENTS**

11/13/95

USEPA      DOE-FN  
30  
COMMENTS



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

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J-0373

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NOV 13 1995

REPLY TO THE ATTENTION OF:  
HSF-5J

Mr. Johnny W. Reising  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

RE: Disapproval of OU 3 RI, FS and  
PP Documents

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Operable Unit (OU) 3 Remedial Investigation (RI)/Feasibility Study (FS) report and Proposed Plan (PP) document.

The RI/FS report provides information on the extent of contamination in the buildings at the production area and addresses alternatives for managing this contamination. The PP provides U.S. DOE's preferred remedy for OU 3.

Although the documents are well organized and clearly present U.S. DOE's analysis and approach for evaluating and addressing OU 3 contamination, several deficiencies exist which must be addressed.

Therefore, U.S. EPA disapproves the OU 3 RI/FS and PP documents pending incorporation of adequate responses to the attached comments. U.S. DOE has thirty (30) days from receipt of this letter to submit a revised document with responses to comments.

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

Sincerely,

James A. Saric, Remedial Project Manager  
Federal Facilities Section  
SFD Remedial Response Branch #2

Enclosures

cc: Tom Schneider, OEPA-SWDO  
Jack Baublitz, U.S. DOE-HDQ  
Don Ofte, FERMCO  
Charles Little, FERMCO  
Terry Hagen, FERMCO  
Michael Yates, FERMCO

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TECHNICAL REVIEW COMMENTS ON THE DRAFT  
 "OPERABLE UNIT 3 REMEDIAL INVESTIGATION/  
 FEASIBILITY STUDY REPORT AND PROPOSED PLAN"

GENERAL COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric  
 Section #: Proposed Plan Page #: NA Line #: NA  
 Original General Comment #: 1

Comment #: The proposed plan indicates that the land use objective adopted for the Fernald Environmental Management Project (FEMP) is to create an undeveloped park. The U.S. Department of Energy (DOE) should discuss the reason for adopting this land use objective. The proposed plan provides only limited information regarding development of other land use alternatives. DOE will need to develop and evaluate such alternatives, especially those providing long-term economic development opportunities. Information regarding DOE's plans to develop and evaluate land use alternatives should be included in the proposed plan.

Commenting Organization: U.S. EPA Commentor: Saric  
 Section #: NA Page #: NA Line #: NA  
 Original General Comment #: 2

Comment #: Throughout the documents, references are made to U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) waivers that will need to be obtained from these agencies. The references are general and should be revised to identify the specific agency granting each waiver and the specific regulations to be covered by the waiver.

Commenting Organization: U.S. EPA Commentor: Saric  
 Section #: NA Page #: NA Line #: NA  
 Original General Comment #: 3

Comment #: The Operable Unit 3 (OU3) remedial investigation/feasibility study (RI/FS) report incorporates the results of

















Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 5.2.4 Page #: 5-9 Line #: 7  
Original Specific Comment #: 13

Comment #: The text states that institutional controls and long-term monitoring measures are not evaluated in the document because the measures specified in the OU2 and OU5 record of decision (ROD) are adequate for OU3 remediation materials. However, the text should incorporate a discussion of the specific institutional controls required by the OU2 and OU5 ROD that apply to interim storage of OU3 remediation materials.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 5.3.2 Page #: 5-12 Line #: 9  
Original Specific Comment #: 14

Comment #: The text indicates that an estimate of the OU3 remediation materials requiring interim storage is presented in Table 5-1. Table 5-1 identifies the quantity of materials generated by D&D of above-grade elements of Plants 4A, 1A, and 9A and projected to be in interim storage from 1995 to 1997. The text should be revised to indicate whether Plant 7 materials not accepted for unrestricted release are included in the estimate. The table should be revised to include a more comprehensive estimate of the volume of remediation materials projected to be in interim storage throughout the remediation activities.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 5.4 Page #: 5-13 Line #: 33  
Original Specific Comment #: 15

Comment #: The text indicates that the administrative requirements of the Interim Record of Decision (IROD) specify that OU3 remediation materials are not to be kept in an interim storage configuration for an extended period of time. The text should be revised to clarify that the



Commenting Organization: U.S. EPA Commentor: Saric

Section #: 5.5.2.1 Page #: 5-23 Line #: 31

Original Specific Comment #: 18

Comment #: The text states that about 26,800 truck trips would be required to convey the OU3 remediation materials to the on-property disposal cell. The text should be revised to include the estimated truck volume or weight used to calculate the estimated number of truck trips.

Commenting Organization: U.S. EPA Commentor: Saric

Section #: Table 5-3 Page #: 5-37 Line #: NA

Original Specific Comment #: 19

Comment #: The FS category column of the table does not include a category description. The table should be revised to include the category description.

Commenting Organization: U.S. EPA Commentor: Saric

Section #: 6.3.2.5 Page #: 6-22 Line #: 19

Original Specific Comment #: 20

Comment #: The text states that the estimated total cost benefit to implementing Alternative 2 instead of Alternative 3 would be \$80,000,000. The text should be revised to explain how this total cost benefit value was derived.

Commenting Organization: U.S. EPA Commentor: Saric

Section #: 6.4.2.4 Page #: 6-37 Line #: 19 to 23

Original Specific Comment #: 21

Comment #: Section 6.4.2.4 compares the implementability of Alternatives 1 through 3. The implementability of Alternative 3 as compared to that of Alternative 2 is not well explained. The text should be revised to discuss (1) the potential administrative difficulties of coordinating shipments of waste with state and local authorities whose jurisdictions lie along waste

































.. Page L.2-256, the first page) includes the qualifier "B."  
DOE should define this qualifier as it applies to inorganic  
analysis results.

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November 9, 1995

C-29A

MEMORANDUM

SUBJECT: Draft Proposed Plan for the  
Operable Unit 3 Remedial Action

FROM: Brian Barwick  
Assistant Regional Counsel

TO: Jim Saric  
Remedial Project Manager

These are my comments on the United States Department of Energy's (U.S. DOE) Draft Proposed Plan for the Operable Unit 3 Remedial Action at the Fernald Environmental Management Project:

Page 13, second paragraph and page 15, 5th paragraph: Replace "except those excluded upon receipt of a waiver from the U.S. EPA" with "or meet the criteria for invoking a waiver under 40 CFR § 300.430(f)(1)(ii)(C)."

Page 17, 1st full paragraph: DOE states that worker exposure is expected to be 360 millirem per year. Later, DOE states that background exposure is 300 millirem per year and that that is 2,300 times greater than the estimated worker exposure. It may be that DOE has included background exposure in the worker exposure estimate but that is not clear. As written, it appears that DOE is stating that 300 millirem is 2,300 times greater than 360 millirem. At a minimum, this paragraph needs clarification.

Page 18, 1st full paragraph: The Fernald Citizens Task Force has recommended an undeveloped park and DOE, U.S. EPA, and OEPA have all stated they will consider that, and other, Task Force recommendations. However, no future land use has been "adopted" for the Fernald site as may be implied in this paragraph. Please revise accordingly.

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