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**PLANT 1 COMPLEX IMPLEMENTATION PLAN**

12/07/95

USEPA      DOE-FN  
6  
COMMENTS

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

FILE

REPLY TO THE ATTENTION OF:

DEC 07 1995

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

SRF-5J

RE: Plant 1 Complex  
Implementation Plan

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the draft Plant 1 Complex-phase I Implementation Plan (IP). The IP includes project-specific design and field activities planned for decontamination and dismantlement of the above-grade portions of eight (8) components located in Operable Unit 3.

Although the IP conforms with generally accepted engineering practices, U.S. EPA has several comments.

Therefore, U.S. EPA disapproves the Plant 1 Complex IP pending receipt of adequate responses to the attached comments, and their incorporation into the IP. U.S. DOE must submit a responses to comments and a revised IP within thirty (30) days receipt of this letter.

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

Sincerely,

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

Enclosure

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

(SHAH (A))  
PARTIAL  
ACTION RESPONSE  
TO D-0180  
(9292)

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Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 2.3.3, Table 2-4 Page #: 14 Line #: NA  
Original Specific Comment #: 4

Comment: Table 2-4 presents the material volume estimates and disposition of the segregation categories. Neither the text nor Table 2-4 discusses the basis of the disposition of the segregation categories. The current OU3 feasibility study (FS) report is evaluating three remedial alternatives, each with a different means of disposition for the segregation categories. The text should be revised to state which remedial alternative was assumed to be implemented in the preparing of Table 2-4.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 2.3.4 Page #: 16 Line #: 4  
Original Specific Comment #: 5

Comment: The text states that the Plant 1 Storage Pad is the primary site for interim storage of materials. However, the Plant 1 Storage Pad cannot be located in Figure 1-1. The text or the figure should be revised to provide the location of the Plant 1 Storage Pad. Further, the text should clarify the type of materials that will be stored on the Plant 1 Storage Pad.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 2.4 Page #: 17 Line #: 17 through 26  
Original Specific Comment #: 6

Comment: The text states that computer modeling of air emissions at the Plant 1 Complex area was performed in October 1995 using contaminant source terms identified in the draft OU3 remedial investigation/feasibility study (RI/FS) report. The text presents a brief discussion of the results. The text should be revised to include additional details concerning the modeling methodology, the input data, and the results of the computer modeling.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 2.4 Page #: 17 Line #: 22 through 26  
Original Specific Comment #: 7

Comment: The text states that for the D&D projects for Plants 7 and 4, the airborne uranium concentrations have been approximately 95 percent below the DOE maximum off-site guideline of 0.1 picoCurie per cubic meter (pCi/m<sup>3</sup>).



Original Specific Comment #: 11

Comment: The text states that above-grade decontamination and dismantlement of the Plant 1 Complex - Phase I will be accomplished by the following six remedial tasks:

- Task I - Preparatory Action - Inventory Removal
- Task II - Preparatory Action - Safe Shutdown
- Task III - Hazardous Waste Management Unit
- Task IV - Asbestos Removal
- Task V - Surface Decontamination
- Task VI - Above-Grade Dismantlement

The remediation of each of the eight components of the Plant 1 - Complex Phase I is discussed in Sections 3.1 through 3.8; however, for each of the components, all six of the tasks are not discussed. Therefore, the text should be revised to state if a task is not applicable for a specific component and should provide an explanation for its exclusion.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 4.0

Page #: 57

Line #: NA

Original Specific Comment #: 12

Comment: The text presents the Figure 4-2 Remediation Schedule.

The figure indicates that the remedial action (RA) report will be submitted on March 4, 1998 when the Plant 1 Complex-Phase I is complete. The figure does not indicate that any interim reporting will be provided prior to the conclusion of remediation activities. The text should be revised to clarify and provide information regarding plans for interim reporting on the Plant 1 Complex - Phase I remediation.