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R-028-207.20

**REMOVAL ACTION 17: REVISION 3**

07/03/96

USEPA      DOE-FN  
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DISAPPROVAL



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

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REPLY TO THE ATTENTION OF: SRF-5J

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

RE: Removal Action 17:  
Revision 3

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) addendum to revision 3 of Removal Action (RA) 17.

This addendum was prepared to address U.S. EPA's previous comments on RA 17 submitted February 15, 1996. The current revision of RA 17 is much improved, but fails to address all of U.S. EPA's concerns. It is not clear which documents will supersede RA 17 during site-wide remediation and a schedule for such deliverables is not mentioned.

Therefore, U.S. EPA disapproves the addendum to RA 17, pending incorporation of adequate responses to the attached comments. U.S. DOE must submit responses to comments and a revised document within thirty (30) days receipt of this letter.

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

Enclosure

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



the U.S. Department of Energy (DOE) will use to track waste materials with respect to the location from where soil or debris was generated and the characterization of the waste from that location. The text should be revised to clarify the issue. Specifically, the text should state the "specific procedures" that will be followed or a reference to the supporting documents that outline such procedures.

Commenting Organization: U.S. EPA  
 Section: Management of Soil... Page #: 3  
 Original SpecificComment #: 3

Commentor: Saric  
 Line #: NA

Comment: The text states that during the interim time frame, excavated soils that are characterized as having levels of contaminants that are lower than the final remediation levels (FRL) for Operable Unit 5 may be used to backfill associated excavations. The text lacks information about the methods that will be used to determine whether levels of contaminants in soils are lower than the FRL and about whether those soils can be used for backfilling. The methodology to be applied in determining whether the soil is acceptable should be included in the text, or, at a minimum, a reference to a supporting document that outlines the methodology should be included in the text.

Commenting Organization: U.S. EPA  
 Section: Figure 2  
 Original SpecificComment #:4

Page #:NA

Commentor: Saric  
 Line #: NA

Comment: It is recommended that in Section 1, Characterization, the methods used to determine how the onsite disposal facility waste acceptance criteria (WAC) was met or not met should be included on the Soil Transport Routing Sheet. For example, the sheet could include a line item that states the characterization method used to determine that the soil met or did not meet the WAC. The items could be presented as check-off boxes with the following categories provided: 1) analytical sample (a line for entering the associated sample number could also be included); 2) remedial investigation data; 3) real-time radiological monitoring data, 4) other methods. The information could be useful at a later date if the origin or characterization of the soil is ever questioned. In addition, the information also could be useful in tracking placement of soils into the onsite disposal facility (OSDF) or in determining the disposition of such soils at an off-site disposal facility.

Commenting Organization: U.S. EPA

Commentor: Saric

Section: Documents to Supersede. Page #: 5

Line #: NA

Original SpecificComment #: 5

Comment: This section should discuss all documents that will supersede the provisions set forth, for soil and debris management, that are contained in the Removal Action 17 Work Plan, not just the Operable Unit 3 documents. It is understood that the remedial action planning documents for each Operable Unit set forth the provisions for the management of soil and debris generated during site-wide remedial actions. However, the Removal Action 17 Work Plan cannot be considered complete unless it includes a comprehensive list of all documents, from all five Operable Units, that will supersede the removal action work plan. A proposed schedule of deliverable dates for all of the documents discussed above should be included in the Removal Action 17 Work Plan.