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

8238

REPLY TO THE ATTENTION OF:

2003 JUN -5 A 10: 22

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

SRF-6J

RE: OU 1 Proposed
Plan/ROD Amendment

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) draft Proposed Plan (PP) for an amendment to the Operable Unit (OU) 1 Record of Decision.

Although this project is over 60% complete this amendment is necessary to align the surface and subsurface soil final remediation levels between the OU 1 and OU 5 RODs; and proposes the placement of Pit 4 soil cover material into the On-Site Disposal Facility. Further these changes may result in a cost savings of more than $4.53 million.

U.S. EPA has found the document to be adequate, but has enclosed several comments that need to be incorporated into the document to further clarify and meet the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act. Therefore, U.S. EPA disapproves the PP pending receipt of a revised document adequately addressing U.S. EPA's attached comments. U.S. DOE must submit responses to U.S. EPA's comments and a revised document incorporating those responses within thirty (30) days receipt of this letter.

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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
Sally Robison, U.S. DOE-HDQ
Jamie Jameson, Fluor Fernald
Terry Hagen, Fluor Fernald
Tim Poff, Fluor Fernald

TECHNICAL REVIEW COMMENTS ON "PROPOSED PLAN FOR AN AMENDMENT TO THE OPERABLE UNIT 1 RECORD OF DECISION"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Not Applicable (NA) Page #: 3 Line #: NA
General Comment #: 1
Comment: The section titled "Overview of Waste Pits Project and the 1995 Record of Decision Remedy" should be revised to state that (1) a key remedy component of the Operable Unit (OU) 1 Record of Decision (ROD) includes disposal of remaining OU 1 residual contaminated soil as documented in the OU 5 ROD and (2)the OU 1 ROD actually calls for re-evaluation of OU 1 remediation levels based on the OU 5 ROD.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA
General Comment #: 2
Comment: The section titled "Soil Cleanup Level Comparison" discusses the proposed change to the technetium-99 (TC-99) cleanup level for OU 1. Table 1 in this section illustrates the OU 1 ROD TC-99 cleanup level for each waste pit and the OU 5 ROD cleanup-levels being proposed to replace the OU 1 ROD clean up levels. This section also explains why the OU 5 ROD cleanup levels are less conservative than the OU 1 cleanup levels. This section should be reorganized to better illustrate the differences in how the OU 1 and OU 5 cleanup levels were derived. An additional table should be added that shows a side-by-side comparison of assumptions used to derive the OU 1 and OU 5 ROD cleanup levels. Further a table showing all of the cleanup levels being changed pursuant to this ROD Amendment should be included in the Proposed Plan.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: 5 Line #: NA
General Comment #: 3
Comment: The section titled "Change No.2 On-Site Disposal of Pit 4 Cap Materials" states that 8,155 cubic yards of the Pit 4 cap material have been shown to meet the waste acceptance criteria (WAC) for the On-Site Disposal Facility (OSDF). This section should be revised to reference the documents that contain the data to support this claim.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: 8 Line #: NA
General Comment #: 4
Comment: Although Table 2 details both changes in relation to the CERCLA nine selection criteria, it is not clear what is required in the original OU 1 ROD. This table must be redesigned to illustrate how the original ROD met the various criteria and how these specific changes differ from the original OU 1 ROD.

Commenting Organization: U.S. EPA Commentor: Barwick
Section #: NA Page #: NA Line #: NA
General Comment #: 5
Comment: U.S. DOE should include a statement that ARARs for OU 1 remain unchanged from the OU 1 ROD.

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SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: 5 Lines #: NA
Specific Comment #: 1
Comment: Paragraph 2 on this page states that the groundwater risk target level for OU 5 is 10^{-5}. The text should be revised to explain that 10^{-5} is within U.S. EPA's target risk range of 10^{-4} to 10^{-6} and therefore is an acceptable target risk level.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: 5 Lines #: NA
Specific Comment #: 2
Comment: The "Readers note" on the bottom of this page states that soil cleanup levels in OU 2 and OU 4 have already been lowered when necessary to correspond with OU 5 levels "or else will be achieved directly through the site-wide soil remediation efforts underway." It is not clear what this statement means with regard to possible ROD amendments for OU 2 and OU 4. The text should specify whether any OU 5 soil cleanup levels expected to be applied to OU 2 or OU 4 are less conservative than those currently in place and if similar ROD amendments for OU 2 and 4 are anticipated in the future.

Commenting Organization: U.S. EPA Commentor: Barwick
Section #: NA Page #: 6 Lines #: NA
Specific Comment #: 3
Comment: On page 6, second paragraph as well in a few other locations in the document it is assumed that the changes will be approved. I suggest replacing, "approval of this change" with "a final determination on this proposed change."

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