



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

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REPLY TO THE ATTENTION OF _____

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JUL 09 1999

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

SRF-5J

RE: Lime Sludge Ponds IRDP

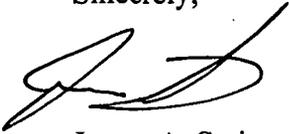
Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Integrated Remedial Design Package (IDRP) for the lime sludge ponds. The draft IRDP consists of the design criteria package, implementation plan, soil boring summary, construction drawings, and water management plan. The IRDP provides the design for excavation of impacted material from the lime sludge ponds and conversion into a waste management facility.

Although the IRDP appears adequate, several elements of the design criteria package, implementation plan, and water management plan require further clarification. Therefore, U.S. EPA disapproves the IRDP for the lime sludge ponds pending receipt and 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
Bill Murphie, U.S. DOE-HQ
John Bradburne, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

Commenting Organization: U.S. EPA Commentor: Saric
 Table #: 2-2 Page #: 2-11 Line #: Not applicable (NA)
 Original Specific Comment #: 4

Comment: This table presents concentrations of various contaminants detected in the perched groundwater near the lime sludge ponds. Some of these concentrations, especially those for total uranium, exceed the FRLs for the Great Miami Aquifer (GMA), which underlies the perched groundwater. The implementation plan should include a figure showing the locations of all the wells listed in the table. The text should be revised to (1) provide further discussion of the concentrations exceeding the GMA FRLs and (2) include either a discussion of means for eliminating the contamination source, a reference to a document that provides such a discussion, or a justification for postponing discussion of perched groundwater remediation to a future document.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: 3.1.2.3 Page #: 3-8 Lines #: 25 through 27
 Original Specific Comment #: 5

Comment: The text states the following "All excavations will be subject to visual observation by both the contractor and Fluor Daniel Fernald personnel for changes in media and the presence of special materials. Contractor personnel will receive field instruction and assistance in identifying special materials." However, the text does not mention how the coarse grained unit (CGU), which could provide a conduit for contaminated water to enter the GMA, will be identified. The text should be revised to specify the field instructions for identifying the CGU during excavation as well as methods for preventing contaminated water from entering the GMA.

SPECIFIC COMMENTS ON WATER MANAGEMENT PLAN

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: 3.1 Page #: 7 Line #: NA
 Original Specific Comment #: 6

Comment: The text states that the waste management facility (WMF) will handle both storm water and groundwater potentially contaminated with volatile organic compounds generated from remediation activities in the former production area. The criteria (based on sampling results) that will be used to determine the portion of the water in the WMF that will be subjected to Phase II advanced wastewater treatment instead of Phase I treatment should be provided in the text.

Commenting Organization: U.S. EPA
Section #: 3.2.2 Page #: 11
Original Specific Comment #: 7

Commentor: Saric
Line #: 7

Comment: The text states that "due to the [liner's] expected service life of approximately 5 years, UV [ultraviolet] degradation should not be a problem." UV degradation of the high-density polyethylene geomembrane liner can occur if the liner is exposed to sunlight for 2 to 4 weeks. Provisions should be made to cover the geomembrane liner with water and to avoid exposing the liner to sunlight for extended periods.