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ADDENDUM TO THE PROJECT SPECIFIC PLAN FOR PHASE I AND PHASE II OF THE OU 2 PREDESIGN INVESTIGATION

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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: Addendum to the Project Specific Plan for Phase I and Phase II of the OU2 Predesign Investigation

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 the Project Specific Plan for Phase I and Phase II of the Operable Unit 2 Predesign Investigation.

This addendum outlines the additional field activities and needed analytical methods that must be applied to enhance the hydrogeologic interpretation, determine the nature and extent of the potential contamination identified, and determine the location of existing drainage tile for the siting of the on-site disposal facility (OSDF). Therefore, U.S. EPA conditionally approves this document pending incorporation of the attached comments.

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

Sincerely,

Eugene Jablonowski for

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

Enclosure

Printed on Recycled Paper

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

ENCLOSURE

TECHNICAL REVIEW COMMENTS ON
THE "ADDENDUM TO THE PROJECT SPECIFIC PLAN
FOR PHASE I AND PHASE II OF THE OPERABLE UNIT 2
PREDESIGN INVESTIGATION"
(Two Pages)

GENERAL COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA
Original General Comment #: 1
Comment: The addendum to the project specific plan does not establish any requirements for reporting the data obtained during this additional investigation or the results of analysis of those data. It is understood that the data obtained will be used to support the design of the on-site disposal facility; however, a summary report outlining the results of this additional investigation should be submitted to the U.S. Environmental Protection Agency (EPA).

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.1 Page #: 4 Line #: 1 through 13
Original Specific Comment #: 1
Comment: This section discusses the use of a flow meter system to determine the flow direction and flow rates of the perched groundwater. U.S. EPA recognizes the use of flow meters for that purpose; however, in a low-flow environment such as tills at the site, the accuracy of such meters is questionable. Flow meters generally are used in high-flow environments. Justification for the use of flow meters and their appropriateness for this investigation should be provided.

Commenting Organization: U.S. EPA Commentor: Saric
Figure #: 1 Page #: NA Line #: NA
Original Specific Comment #: 2
Comment: Figure 1 should show the location of the existing drainage tile network.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.3 Page #: 5 Line #: 7 through 9
Original Specific Comment #: 3
Comment: This section provides the methodology for collection of

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samples of perched groundwater from the vicinity of wells 11547 and 11548. The text states that samples of unfiltered water will be collected from 16 locations for analysis of total uranium. The text states further that, "if contaminated water is encountered, up to three additional wells per existing well location may be installed to confirm the nature and extent of contamination." The proposal for as many as six new groundwater monitoring wells in the area of the on-site disposal facility seems excessive because of the associated cost and the need to preserve the integrity of the underlying clay unit. It is recommended that new monitoring wells be installed only if doing so is the only practicable means of characterizing the perched water zone. Collection of perched water samples using a geoprobe and collection of surface soil samples is a preferred alternative to the installation of additional monitoring wells.