

381

5-308.1

DRAFT OU 5 AREA 1, PHASE 1 RA WORK PLAN - (DISAPPROVAL)

08/28/96

USEPA
8
COMMENTS

DOE-FN



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

381

J-2801

AUG 20 10 53 AM '96

AUG 28 1996

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: Draft OU 5 Area 1,
Phase 1 RA Work Plan

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 Operable Unit (OU) 5 Area 1, Phase 1, Remedial Action (RA) work plan.

The purpose of the RA work plan is to describe the sampling locations and procedures for certifying the area clean. Although the sampling locations and constituents for analysis are adequate U.S. EPA has several concerns regarding the certification portion of the work plan. Specifically, the work plan is not clear regarding which areas will be certified and it does not present project schedules.

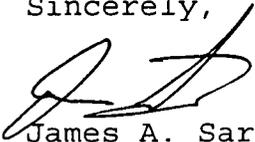
Therefore, U.S. EPA disapproves the RA work plan pending incorporation of adequate responses to the attached comments. However, U.S. EPA does approve the sampling and analysis portion of the plan. Thus U.S. DOE may commence field activities prior to U.S. EPA's concurrence on the certification of the work plan.

U.S. DOE must submit a revised work plan and responses to comments within thirty (30) days receipt of this letter.

-2-

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
Tom Walsh, FERMCO

due to budget constraints, Areas A and D and all adjacent areas ... will not be certified by this work plan." First, the statement concerning which areas will be fully certified is inconsistent with other portions of the document. For example, Section 3.1.1 indicates that only Area B Northwest will be certified, but Table 3-1 indicates that Areas B and C may not be certified under the scope of Area 1, Phase 1. Furthermore, the table indicates that certification will be conducted "prior to OSDF construction." Whether this is inclusive of the Phase 1, Area 1 scope of work is unclear. The text should be revised to consistently and accurately present certification information. Second, the funding issue and its relevance to the scope of work should be clarified. In addition, if funding will impact some or all of the scope of work, tasks should be prioritized in the work plan.

Commenting Organization: U.S. EPA
Section #: 3.1.4
Original Specific Comment #: 2

Commentor: Saric
Page #: 3-2
Line #: NA

Comment: The text states that soil contamination is expected in the top 6 inches of soil. This statement is inconsistent with Figure 2-2 which shows anticipated contamination in Area D at depths up to 5 feet below ground surface. The text and/or figure should be revised to present consistent and correct information.

Commenting Organization: U.S. EPA
Section #: 4.4
Original Specific Comment #: 3

Commentor: Saric
Page #: 4-16
Line #: NA

Comment: The proposed project schedule indicates a start date for soil remediation in August 1996. It appears that this schedule is incorrect. It is unlikely that work will start in August, based on the date of this submittal. This date should be revised if incorrect. Also, the schedule should be expanded to include deliverables, an approximate timeline of activities including the estimated start and finish date for Area 1, Phase 1 activity and other related tasks such as the construction of the OSDF.

Commenting Organization: U.S. EPA
Table #: 5-1
Original Specific Comment #: 4

Commentor: Saric
Page #: 5-8
Line #: NA

Comment: This flow chart states that there are 16 contaminants of concern (COC) identified in the ecological risk assessment; however, the the text on Page 5-3 state that 17 COCs result from the ecological risk assessment. The numbers should be consistent.

