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AREA 1, PHASE 1 RTC

11/01/96

USEPA DOE-FN
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COMMENTS

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

K-0258

NOV 4 8 42 AM '96

FILE: 6446.6

NOV 0 1 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: Area 1, Phase 1 RTC

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) Responses to Comments (RTC) on the Operable Unit (OU) 5 Area 1, Phase 1 Remedial Action (RA) work plan.

The RTC appear to have adequately responded to the majority of U.S. EPA's comments. However, several issues need to be further resolved. Also, considering the extensive changes in the work plan as a result of required construction activities and discussions between all parties, U.S. EPA must review a revised document incorporating adequate responses to the attached comments before the RA work plan can be approved.

Therefore, U.S. EPA disapproves the Area 1, Phase 1 RTC pending incorporation of adequate responses to the attached comments. U.S. DOE must submit a revised work plan and responses to comments within thirty (30) days receipt of this letter.

(janke(rj)
partial
action
response
To doc-0007-97
(10058)

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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
Jack Baublitz, U.S. DOE-HDQ
John Bradburne, FERMCO
Charles Little, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

ENCLOSURE
DRAFT TECHNICAL REVIEW COMMENTS ON THE
RESPONSE DOCUMENT FOR THE U.S. EPA TECHNICAL REVIEW COMMENTS ON THE "DRAFT OPERABLE UNIT 5, AREA 1, PHASE 1 REMEDIAL ACTION WORK

GENERAL COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #:NA Line #: NA
Original General Comment #:1
Comment: The text states that the Area 1 Phase 1 Remedial Action Work Plan (RAWP) will address certification of most of the removal areas. The text further states that the prior omission of certification was based on funding issues, which is resolved. EPA notes that funding should not be cited as a reason for omitting critical elements of a work plan. As an example, if permanent structures will be built or irreversible actions are taken without certifying compliance with the cleanup goals identified in the record of decision (ROD), then these actions may not be compliant with the ROD. To the extent possible, the work plan should be developed in a manner that funding issues do not cause critical gaps in implementing components of work or that would result in potential non-compliance with the ROD.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #:NA Line #: NA
Original General Comment #:1
Comment: The text identifies an overall schedule for implementing tasks for each certification area. Two issues were noted during the October 22, 1996 telephone conversation that may impact the schedule.

The first issue relates to certification of the access road area. This area is currently being excavated and construction is planned prior to submittal of a certification report. It is unclear whether a separate project specific plan (PSP) is being submitted to certify this area. The schedule for certifying the roadway area should be clearly identified.

Second, both OEPA and U.S. EPA are concerned with the use of field instrumentation for preliminary certification without the submittal and approval of the comparability study. It is understood that a work plan will be submitted on October 31, 1996. The text should include a schedule for completion and approval of the comparability study.

The current schedule for review and approval of deliverables is thirty days. U.S. EPA believes that this time frame may

be too optimistic, based on the possibility that some deliverables may be disapproved.

SPECIFIC COMMENTS

Commenting Organization: U.S EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA
Specific Comment #:1 (Original Specific OEPA Comment #:14)
Comment: The text states that drain tiles in the northwestern portion of the site will not be excavated. U.S. EPA concurs with the comments made by OEPA during the October 22, 1996 meeting. Based on a subsequent meeting on October 29, 1996, EPA understands that the adjacent property owner has requested that the tiles remain in place. The revised work plan should include plans to ensure that leaving the drain tile system will not result in potential offsite impacts or unacceptable risk. This should be viewed in light of the possible increased deposition of dust during this area during soil excavation.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA
Specific Comment #: 2 (Original Specific OEPA Comment #: 16)
Comment: The text states that actions will be taken to comply with the fugitive dust-emission limits/ceilings as designated in the OU2 and OU5 RODs. U.S. EPA concurs with OEPA's concern over visible dust emissions. It seems reasonable that emissions should be aggressively monitored in accordance with as low as reasonable achievable (ALARA) objectives. If the OU2 and OU5 ROD references are not adequately protective of human health, then it may be appropriate to consider more stringent criteria. The text should be revised to consider the issue of dust emission and monitoring.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA
Specific Comment #: 3 (Original Specific OEPA Comment #: 30)
Comment: The text states that field instrumentation will be used to ensure that residual soil contamination exceeding the final remediation levels (FRL) will not be left in place. The text states, however, that a 3-times rule may be used as a "not to exceed hot spot criteria", because the average contamination levels may be acceptable. U.S. EPA concurs with OEPA that leaving hot spot areas in place with contamination at 3-times the FRL does not appear to meet the intent of the ROD. While the average contaminant values would attain FRLs, contamination would be left in place that clearly exceeds FRLs. DOE should provide further justification for leaving such hot spots in place, considering the fact that instruments may have clearly delineated an area requiring remediation. It appears that

leaving such, known, contamination hot spots in place would not meet the remediation goals stated in the ROD.