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OU 5 DRAFT REMEDIAL ACTION WORK PLAN

01/08/97

USEPA DOE-FEMP
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COMMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

0537

K-0679

JAN 20 1997

REPLY TO THE ATTENTION OF:

January 8, 1997

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

SRF-5J

RE: OU 5 Draft Remedial
Action 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 Remedial Action (RA) work plan.

The RA work plan proposes remedial actions which are technically feasible and meet the intent of the Record of Decision. However, the work plan presents a general discussion of activities or aquifer restoration modules rather than providing specific information on remedial activities and a detailed schedule for initiation and completion of major milestones.

Therefore, U.S. EPA disapproves the Ra work plan 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.

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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

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Commenting Organization: U.S. EPA Commentor: Saric
 Section #:2 Page #: NA Line #: NA
 Original General Comment #: 4

Comment: Table 2-1 of the RAWP presents a schedule for several ARMs. The schedule does not include activity milestones, such as completion of site work, testing and acceptance, and system operation. The schedule should establish dates for this type of milestone.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #:2.1.4 Page #: NA Line #: NA
 Original General Comment #:5

Comment: The table below presents timeframes for the remedial design (RD) and remedial action (RA) milestones. As shown in the table, long periods of time elapse between milestones. For example, the South Field Extraction System Phase I ARM, which consists of nine wells around the perimeter of the South Field, could be installed and operating before the projected start-up date of January 1999. Similarly, it is unclear why the South Plume Optimization Module I will require 14 months until contract award and another 11 months for well installation. An expanded schedule should be provided in the RAWP for each ARM, as well as rationales for the long timeframes.

ARM	Prefinal Design Package ^a	Months Until RA Contact Award	RA Contract Award ^b	Months Until RA Installation	Projected Start-up Date ^c
South Field Extraction System Phase I	complete	15	3-16-98	9	1/99
South Field Extraction System Phase II	TBD ^d		TBD		1/04
Advanced Wastewater Treatment	7/30/96	7	3/12/97	9	1/98
Injection Demonstration	12/1/96	10	9/5/97	3	1/98
South Plume Optimization Module I	12/1/96	14	2/10/98	11	1/99
South Plume Optimization Module II	TBD		TBD		

ARM	Prefinal Design Package ^a	Months Until RA Contact Award	RA Contract Award ^b	Months Until RA Installation	Projected Start-up Date ^c
Waste Storage Area	11/30/01		TBD		1/04
Plant 6	11/30/01		TBD		1/04

Notes:

- a Milestone dates are based on the RDWP for RAs at Operable Unit (OU) 5 dated April 1996.
- b Milestone dates are based on the RAWP for aquifer restoration at OU 5 dated November 1996.
- c Milestone dates are based on the baseline RA report for Aquifer Restoration RD dated October 1996.
- d TBD = To be determined

SPECIFIC COMMENT

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 2.2.1 Page #:11

Line #: 22

Original Specific Comment #: 1

Comment: The text states that the existing capacity of the AWWT facility will be expanded to the maximum extent achievable within the confines of Building 51. Although this approach has been previously discussed with U.S. EPA, it should be noted that no language in the record of decision limits the capacity of the treatment system required. The enforceable requirement of the ROD is the discharge limit for uranium and not the capacity of the treatment system. DOE must provide sufficient treatment capacity to meet the discharge limit.