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OSDF FINAL DESIGN AND LEACHATE CONVEYANCE SYSTEM

11/22/96

USEPA

DOE-FN

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COMMENTS



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

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REPLY TO THE ATTENTION OF:

NOV 22 1996

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

SRF-5J

RE: OSDF Final Design and
Leachate Conveyance System

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) final design package for the On-Site Disposal Facility (OSDF) and the leachate conveyance system.

The final package includes design drawings, systems plan and associated specifications for the leachate conveyance system, and support plans. However, the support plans do not include a revised OSDF groundwater detection and monitoring plan or the OSDF air monitoring plan. These plans are schedule to be submitted in December 1996 and January 1997, respectively.

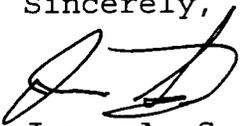
U.S. DOE has adequately addressed the majority of U.S. EPA's comments on the 90 percent design package, however a few issues require further clarification.

Therefore, U.S. EPA approves the OSDF final design and leachate conveyance system package pending incorporation of adequate responses to the attached comments. U.S. EPA does not approve placement of materials into the disposal cell until all support plans have been approved, specifically the groundwater monitoring and air monitoring plans. This approval in no way certifies the design for construction. In addition, U.S. EPA's approval does not imply that the remedy, when constructed, will meet the performance standards or, be accepted.

(WARNER)(R)
PARTIAL
ACTION RESPONSE
TO DOE-0045-97
(10/31)

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
- Michael Yates, FERMCO

TECHNICAL REVIEW COMMENTS ON "FINAL DESIGNS OF THE ON-SITE DISPOSAL FACILITY AND LEACHATE CONVEYANCE SYSTEM"

GENERAL COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Not Applicable (NA) Page #: NA Line #: NA
DOE Response #: 1 (Original General Comment #: NA)
Comment: The On-Site Disposal Facility (OSDF) final design package was submitted without the OSDF groundwater detection and monitoring plan and the OSDF air monitoring plan. Previous U.S. Environmental Protection Agency (U.S. EPA) comments on these plans identified numerous technical deficiencies. U.S. EPA also identified technical deficiencies in the separately submitted Integrated Environmental Monitoring Plan (IEMP) that corresponded to those in the OSDF-specific plans. It has been agreed that additional time is needed to revise the OSDF-specific plans for consistency with the revised IEMP, which is to be submitted in January 1997. However, the U.S. Department of Energy (DOE) should provide a schedule for the submittal of the revised OSDF-specific plans.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA
DOE Response #: 2 (Original General Comment #: NA)
Comment: U.S. EPA original specific comments 19 and 20 on the OSDF prefinal (90 percent) design package request additional revisions to the OSDF groundwater detection and monitoring plan. DOE's responses to these specific comments should be incorporated into the revised plan.

SPECIFIC COMMENTS

Design Criteria Package

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.5.3 Page #: 2-50 Line #: NA
DOE Response #: 3 (Original Specific Comment #: 3)
Comment: DOE's response to the original specific comment on the prefinal (90 percent) design states that text will be added in Section 2.5.3 regarding the seal of the liner system around the double-walled high density polyethylene (HDPE) pipe. However, no text has been added to this section. DOE should add the text to the certified for construction (CFC) design package in Section 2.5.3.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.8.3 Page #: 2-90 Line #: NA
DOE Response #: 4 (Original Specific Comment #: 4)
Comment: The original specific comment requests that DOE provide additional information regarding (1) the discharge of storm

Commenting Organization: U.S. EPA Commentor: Saric
 Sheet #: S-1 and S-2 Page #: NA Line #: NA

DOE Response #: 9 (Original Specific Comment #: 13)

Comment: DOE's response to the original specific comment states that the specifications package will be revised and notes will be added to drawings S-1 and S-2 to direct the subcontractor to Section 16100 of the specifications package. The specifications package has been revised accordingly, and drawing S-1 contains the notes; however, drawing S-2 has not been revised to incorporate the notes. Drawing S-2 should be revised to include the notes.

Commenting Organization: U.S. EPA Commentor: Saric
 Sheet #: X-7 Page #: NA Line #: NA

DOE Response #: 10 (Original Specific Comment #: NA)

Comment: The sheet contains coordinates for cone penetration tests 11630, 11651, 11661, and 11671 that appear to be inaccurate. The coordinates should be checked and corrected if necessary.

Commenting Organization: U.S. EPA Commentor: Saric
 Sheet #: 51 Page #: NA Line #: NA

DOE Response #: 10 (Original Specific Comment #: NA)

Comment: Note 10 on plan 109/G-11 refers to an electric service panel. This reference is incorrect and should be revised.

Post-Closure Care and Inspection Plan

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: 1.2 Page #: 1-1 Line #: 33

DOE Response #: 12 (Original Specific Comment #: NA)

Comment: The text states that a description of the parties responsible for post-closure care and inspection (PCCI) and related plans is presented in sections following Section 1.2. However, no such description is presented. The PCCI plan should be revised to include a description of the parties responsible for PCCI and the plans related to it.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: 5.3 Page #: 5-1 Line #: 35 and 36

DOE Response #: 13 (Original Specific Comment #: NA)

Comment: The text states that if a leak from the OSDF is detected, DOE will consult U.S. EPA and the Ohio Environmental Protection Agency (OEPA) to determine what action is required. However, the text does not indicate how soon after a leak detection DOE will consult EPA and OEPA. The PCCI plan should be revised to state how soon after a leak detection DOE will consult EPA and OEPA to determine what action is required.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 8.3 Page #: 8-2 Line #: 26 through 29

DOE Response #: 14 (Original Specific Comment #: NA)

Comment: The text states that the quarterly report submitted to EPA and OEPA will contain the results of contingency inspections. However, any severe damage to the OSDF or its surroundings might require immediate notification of EPA and OEPA. The PCCI plan should be revised to address the potential need for immediate notification of EPA and OEPA regarding contingency inspection results.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 8.3 Page #: 8-3 Line #: 1

DOE Response #: 15 (Original Specific Comment #: NA)

Comment: The text refers to a preliminary inspection and assessment report to be prepared following a contingency inspection. However, the text does not specify the contents of this report or the schedule for submitting it to EPA and OEPA. The PCCI plan should be revised to specify the minimum content of the report and the schedule for submitting it to EPA and OEPA.