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3-208.10

OU 3 INTEGRATED RD/RA WORK PLAN

01/23/97

USEPA

DOE-FEMP

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COMMENTS



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

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JAN 24 10 57 AM '97
FILE: 6446.4

JAN 23 1997

REPLY TO THE ATTENTION OF: _____

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 3 Integrated RD/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) 3 integrated Remedial Design (RD)/ Remedial Action (RA) work plan.

The integrated OU 3 RD/RA work plan was designed to meet the requirements of the September 24, 1996, Record of Decision (ROD) and integrate OU 3 interim remedial actions, OU 3 final remedial actions, and removal actions within OU 3.

Although the RD/RA work plan adequately addresses the requirements of the ROD several deficiencies were identified.

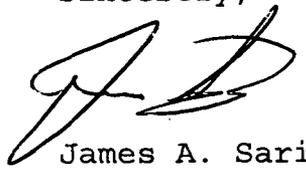
Therefore, U.S. EPA disapproves the OU 3 integrated RD/RA work plan pending receipt and incorporation of adequate responses to the attached comments. U.S. DOE must submit responses to comments and a revised work plan within thirty (30) day receipt of this letter.

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partial
action
response
to doe-0208-97
(10120)

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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

24, 1996. The schedule for dismantling the five aboveground structures is not discussed in the IWP. The IWP should be revised to present the schedule for dismantling the five aboveground structures.

Commenting Organization: U.S. EPA
 Section #: 2.5
 Original Specific Comment #: 2
 Comment: The text states that the Miscellaneous Complex consists of general components that will be included piecemeal in other complexes. The text then identifies the Miscellaneous Complex reassignments. The text should be revised to clarify that the list of Miscellaneous Complex reassignments is a complete list of all general components to be included piecemeal in other complexes.

Commentor: Saric
 Page #: 2-21
 Line #: 6 to 8

Commenting Organization: U.S. EPA
 Section #: 3.3.2.2
 Original Specific Comment #: 3
 Comment: The text states that the Sitewide Waste Information, Forecasting and Tracking System (SWIFTS) database is a computerized system that was designed to allow for tracking of all wastes from project generation to disposition location. The text provides no information regarding how the SWIFTS database will assist in integrating the management of OU3 waste materials with the management of waste materials from the other OUs. In addition, no information is provided regarding the reporting capabilities of the SWIFTS database. The text should be revised to clarify this issue or to appropriately reference where this information can be found.

Commentor: Saric
 Page #: 3-52
 Line #: 1 to 2

Commenting Organization: U.S. EPA
 Section #: 3.3.2.3
 Original Specific Comment #: 4
 Comment: The text discusses the details of staging and interim storage of debris. However, the text does not specify the measures that will be taken to prevent spreading of contaminated debris by wind, surface runoff, and animals. The text should be revised to discuss these measures.

Commentor: Saric
 Page #: 3-52 to 3-57
 Line #: NA

Commenting Organization: U.S. EPA
 Section #: 3.6.2
 Original Specific Comment #: 5
 Comment: The text refers to project-specific monitoring plans and the analysis of monitoring results. The text should be revised to clarify that project-specific environmental monitoring plans will be included in project-specific implementation plans and monitoring results will be included in project completion reports.

Commentor: Saric
 Page #: 3-98
 Line #: 6 to 10

Commenting Organization: U.S. EPA
 Section #: 3.6.2.1 Page #: 3-99
 Original Specific Comment #: 6
 Comment: The text states that the objective of environmental air monitoring will be to quickly assess project results so that mitigative measures can be implemented should airborne concentrations of contaminants significantly exceed established background levels. The text should be revised to list the potential mitigative measures.

Commentor: Saric
 Line #: 2 to 4

Commenting Organization: U.S. EPA
 Section #: 3.6.2.1 Page #: 3-99
 Original Specific Comment #: 7
 Comment: The text states that individual air monitoring plans will be developed during the RD and detailed in the project-specific implementation plans. The text should be revised to discuss the basic components of the air monitoring plans that will be included in the project-specific implementation plans.

Commentor: Saric
 Line #: 8 to 10

Commenting Organization: U.S. EPA
 Section #: 3.6.2.1 Page #: 3-101
 Original Specific Comment #: 8
 Comment: The text states that the number of continuous air monitors used in support of the project will be determined based on the dose magnitudes. The dose magnitudes, the information used to determine them, and the details of how the number of continuous air monitors will be determined based on the dose magnitudes should be included in the air monitoring plan, as part of the project-specific implementation plan.

Commentor: Saric
 Line #: 7 and 8

Commenting Organization: U.S. EPA
 Section #: 4.2.3.5 Page #: 4-23
 Original Specific Comment #: 9
 Comment: The text discusses prefinal inspection and the prefinal inspection report. The text should be revised to clarify whether a copy of the prefinal inspection report will be submitted to U.S. EPA as part of the project completion report.

Commentor: Saric
 Line #: 7 to 18

Appendix B

Commenting Organization: U.S. EPA
 Section #: NA Page #: NA
 Original Specific Comment #: 10
 Comment: The generic performance specifications for decontamination and dismantlement consist of Divisions 1, 3, 4, 5, 7, 14, and 15. However, the specifications should include Division 16, "Electrical," because dismantlement of

Commentor: Saric
 Line #: NA

equipment in certain OU3 structures could involve electrical wiring and connections.

Commenting Organization: U.S. EPA
 Section #: 01515, 1.5 A.3 Page #: 4
 Original Specific Comment #: 11
 Comment: The text discusses complying with Soil Conservation Service standards and submitting a plan for providing erosion control and soil stabilization in all disturbed areas. However, no generic performance specification for soil erosion and sedimentation control is included. This specification should be provided in Appendix B.

Commenting Organization: U.S. EPA
 Section #: 05125, 1.2 B Page #: 1
 Original Specific Comment #: 12
 Comment: The text lists "Section 03900-Foundations" as a related section, but this section is not included in Appendix B. This section should be provided in Appendix B.

Appendix D

Commenting Organization: U.S. EPA
 Section #: 1.3 Page #: 1-2 and 1-3
 Section #: 2.5 Page #: 2-20 to 2-23
 Original Specific Comment #: 13
 Comment: The text in these reference sections discusses project-specific sampling and analysis plans (SAP). The text should be revised to state that the project-specific SAPs will be included in the project-specific implementation plans to be submitted to U.S. EPA for review.