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RAWP FOR AREA 1, PHASE 1 SOILS

02/04/97

USEPA DOE-FEMP
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COMMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

K-0906
FEB 5 11 03 AM '97
6446.6

FEB 04 1997

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: RAWP for Area 1,
Phase 1 Soils

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) revised Remedial Action Work Plan (RAWP) for the Area 1, Phase 1 soils.

As a result of several meetings and conference calls to resolve major issues concerning soil certification in achieving final remediation levels, this document has been dramatically changed since U.S. DOE's original July 17, 1996, submittal and U.S. EPA's October 9, 1996, comments.

Presently, all parties are not in agreement on several issues. Two major concerns include certification procedures and the use of real-time radiological monitoring. A statistical approach for comparing actual laboratory data to "real-time" data has not been agreed upon.

Therefore, U.S. EPA disapproves the RAWP for Area 1, Phase 1 soils pending incorporation of adequate responses to the attached comments.

Representatives of U.S. EPA, U.S. DOE, and the Ohio Environmental Protection Agency are meeting on February 11, 1997, to discuss these soil issues. At that time a path forward for submittal of soil certification reports, the future of this particular RAWP, and resolution of other outstanding issues before the submittal of the next soil remediation work plan will be discussed.

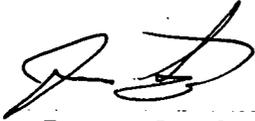
These soil certification issues are essential for U.S. DOE to successfully demonstrate soil cleanup is achieved at the site. U.S. EPA is committed to resolving these issues as soon as possible.

*(jankelrj)
partial
action response
to doe-0265-97(10010)*

-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

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2. Given that a CU exceeds one or more FRLs but not by much, will the innovative procedure determine that the CU exceeds the FRL or FRLs?

These decisions have a binomial distribution. At best, the design in Table B-1 will give a probability of 0.125 that the innovative procedure did not err in the first case. This probability is not adequate for a decision comparability study. DOE should add a considerably greater number of test areas. If necessary, the planned submittal date of March 1997 for the comparability study report should be changed to ensure that an adequate report is submitted.