



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

L-1005

REPLY TO THE ATTENTION OF.

MAR 09 1998

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

SRF-5J

RE: Sitewide Excavation
Plan 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) Response to Comments (RTC) on the Sitewide Excavation Plan (SEP).

Several meetings were held between representatives of U.S. EPA, U.S. DOE and the Ohio Environmental Protection Agency regarding the SEP and related soils excavation procedures and projects. As a result of the cooperative effort between the Agencies several difficult issues have been resolved.

U.S. DOE has adequately addressed the majority of U.S. EPA's previous comments. However, a few issues remain, and a final version of the SEP will be necessary to assure the comments were incorporated into the document.

Therefore, U.S. EPA disapproves the RTC on the SEP pending incorporation of adequate responses into the document. U.S. DOE must submit a final SEP incorporating the RTC within thirty (30) days receipt of this letter. It is anticipated the issues can be resolved via a meeting or conference call, and U.S. EPA anticipates approving the revised SEP document.

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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
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

conditions may not reflect surface conditions, and (3) allowing for complex subsurface conditions. The SEP should be revised to address these issues as discussed below.

First, it is not clear how an excavation will be handled in a large area such as the former production area. Excavation (and backfilling) may proceed in an area by area fashion in order to minimize exposure of a given working area or to allow for selective removal of structures. In these cases, it may not be efficient or otherwise appropriate to slope all sides of an excavation equally, and the SEP should allow for use of driven barriers or other means of maintaining excavation integrity.

Second, DOE has assumed that the predesign investigation will eliminate the potential for "surprises" as excavation proceeds. In an area as complex as the former production area, it may not be possible to completely characterize the subsurface before excavation begins. The presence of subsurface structures and fill may or may not reflect the surface footprint of contamination. The SEP should provide for flexibility in the excavation approach to ensure efficient excavation of subsurface contamination that does not reflect the surface footprint.

Third, it is not clear how excavation will proceed from the perimeter of the work area toward the contaminated area or areas. The SEP should explain how a large area will be excavated; in particular, the SEP should explain how complex subsurface features at or near a unit boundary will be effectively removed.

SPECIFIC COMMENT

Commenting Organization: U.S. EPA
Section #: 3.2 Page #: 3-9
Original Specific Comment #: 10

Commentor: Saric
Line #: 20

Comment: The original specific comment states that the draft SEP describes no specific method to determine the quality of the remediation wastewater. DOE's response states that when necessary, remediation wastewater will be pretreated to remove organic contaminants prior to placing the water in the appropriate main treatment loop. It is not clear how DOE will determine whether pretreatment is necessary. The SEP should be revised to address this issue.