



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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REPLY TO THE ATTENTION OF

SRF-5J

NOV 12 1998

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

RE: A1,P2 IRDP

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 final Integrated Remedial Design (IRDP) package for Area 1, Phase II (A1,P2).

The IRDP provides the overall plan for remediating the central and southern parts of Area 1.

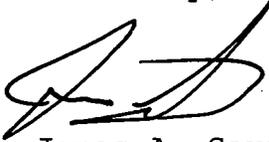
The IRDP for A1,P2 has been extensively revised. The majority of U.S. EPA's previous comments have been addressed, however there are some issues that must be resolved. The IRDP is incomplete in that it does not provide information pertaining to waste acceptance criteria delineation of soils in the footprint of the former Sewage Treatment Plant (STP). Also, specific mixture procedures for digester sludge stabilization, and disposal requirements for at-and below-grade digester structures have not been provided.

Based on discussions at the October 14, 1998, meeting between representatives of U.S. EPA, U.S. DOE and the Ohio Environmental Protection Agency, this information is to be submitted in the form of an addendum to the A1,P2 IRDP.

Therefore, U.S. EPA disapproves the A1,P2 IRDP pending incorporation of adequate responses to the attached comments, and submittal of the addendum to the A1P2 IRDP and its subsequent incorporation into the IRDP.

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

SPECIFIC COMMENTS

IMPLEMENTATION PLAN FOR AREA 1, PHASE II
(Revision D)

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.3.2.2 Page #: 2-28 and 2-29 Line #: NA
Original Specific Comment #: 1

Comment: The text discusses Phase 3 sampling to delineate technetium-99 contamination and refers to 41 sampling locations. However, the table in Appendix B-4 and Figure 2-23 indicate 46 sampling locations for Phase 3. The text should be revised to resolve this discrepancy. In addition, the text on page 2-28 provides no discussion of analytical results for samples collected from sampling locations 70 through 76. This information should be included.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.3.2.3 Page #: 2-30 Line #: 26
Original Specific Comment #: 2

Comment: The text has been corrected to use the term "detection quantitation limit" as a result of U.S. Environmental Protection Agency's (U.S. EPA) Original Specific Comment No. 14 on the November 1997 IRDP. The word "detection" should be deleted from this term.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.2.2.1 Page #: 3-14 Line #: 16 and 17
Original Specific Comment #: 3

Comment: The text states that stabilized digester sludge and other technetium-99 contaminated soil will be separated from uranium-contaminated soil in Soil Pile (SP-) 7. The cover letter indicates that the two contaminated soil areas will be separated by a ditch to prevent runoff from the technetium-99 soil from contaminating the uranium-contaminated soil. The material excavated to create the ditch will then be used to construct a berm between the two areas. It is not clear why these controls are necessary given the fact that the U.S. Department of Energy (DOE) plans to ship all stockpiled material in SP-7 off site for disposal in Fiscal Year 1999. The text should be revised to address this issue.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.2.5 Page #: 3-19 Line #: NA
Original Specific Comment #: 4

Comment: The second and third paragraphs of this section are repetitive. One of the two paragraphs should be omitted.

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Commenting Organization: U.S. EPA
Section #: 3.2.5.3 Page #: 3-22
Original Specific Comment #: 5

Commentor: Saric
Line #: NA

Comment: The text states that the radiation scanning system (RSS) will be used to scan the perimeter and floor of the sludge drying bed excavation to confirm that above-WAC material is not present. It is likely that the RSS will be used for the same purpose in other STP areas during remediation. Although procedures for using the RSS have been incorporated into the User's Manual, calibration information has not yet been provided to the regulatory agencies for review and approval. This information should be provided in a comparability or other document before the RSS is used during STP remediation activities.

Commenting Organization: U.S. EPA
Section #: Appendix B-2 Page #: NA
Original Specific Comment #: 6

Commentor: Saric
Line #: NA

Comment: U.S. EPA's Original Specific Comment No. 7 on the November 1997 IRDP requests that undefined, nonstandard data qualifiers, such as "NV," in Appendix B be defined. However, all isotopic data in the Appendix B-2 table are still qualified as "NV," and no definition of the qualifier is provided. The table should be revised to include a definition of this and all other data qualifiers used in the table.

Commenting Organization: U.S. EPA
Section #: Appendix B-4 Page #: 1
Original Specific Comment #: 7

Commentor: Saric
Line #: NA

Comment: The result for sample "A1P2TC-50-2-R" is noted as "<MDL," but all other similar results are listed as "<MDC." This discrepancy should be corrected, and the acronym used should be defined.

SPECIFIC COMMENTS

**TECHNICAL SPECIFICATIONS FOR
SEWAGE TREATMENT PLANT EXCAVATION
(Revision 0A)**

Commenting Organization: U.S. EPA
Specification #: 02205 Page #: NA
Original Specific Comment #: 8

Commentor: Saric
Line #: NA

Comment: U.S. EPA's Original Specific Comment No. 26 on the November 1997 IRDP notes that the removal of old agricultural drainage tile is not discussed in this specification. DOE's response states that Specification 02205 will be modified to include removal of agricultural drainage tiles. However, the text of Specification 02205

has not been modified to include this information. Section 3.5 of this specification should be modified to include the removal and handling of agricultural drainage tiles. Also, for consistency with page 3-16 of the implementation plan, the specification should state that the excavations will not be extended to remove drainage tiles that may be present beyond excavation limits.

Commenting Organization: U.S. EPA
Specification #: 15160 Page #: 1
Original Specific Comment #: 9

Commentor: Saric
Line #: NA

Comment: The text of Section 1.1 refers to three pumps, PMP-1 through PMP-3. However, other sections of the IRDP, such as Section 3.3 of the Systems Plan (Appendix D of the implementation plan), refer to a fourth pump, PMP-4. This discrepancy should be reconciled.