



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

3036

REPLY TO THE ATTENTION OF

FERNALD
LOG A-1426
JUN 19 9 42 AM '00
FILE: 6446.6268
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MAY 16 2000

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

SRF-5J

RE: Area 3A/4A 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 Integrated Remedial Design Package (IRDP) for Area 3A/4A.

The IRDP provides an implementation plan, construction drawings, and technical specifications for conducting remediation in Area 3A/4A in the former production area.

The document is incomplete, does not fully delineate the extent of the subsurface contamination for excavation, and requires clarification on several issues. Therefore, U.S. EPA disapproves the Area 3A/4A IRDP pending receipt and incorporation of adequate responses to the attached comments. U.S. DOE must submit a revised IRDP along with responses to comments within thirty (30) days receipt of this letter.

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, Fluor Fernald
Terry Hagen, Fluor Fernald
Tim Poff, Fluor Fernald

Commenting Organization: U.S. EPA
Section #: NA Page #: NA
Original General Comment #: 4

Commentor: Saric
Line #: NA

Comment: During perimeter trenching, the pipes for a number of underground utilities will have to be cut. Therefore, provisions should be made to drain liquids from the underground pipes prior to cutting them. The text should be revised to address this issue.

Commenting Organization: U.S. EPA
Appendix #: B Page #: NA
Original General Comment #: 5

Commentor: Saric
Line #: NA

Comment: The surface water management plan does not adequately address the issue of the wastewater treatment plant's capability to handle the volatile organic compound-contaminated water that is expected to be encountered during excavation in Areas 3A and 4A. The text should be revised to address this issue.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA
Section #: 3.2.3 Page #: 3-3
Original Specific Comment #: 1

Commentor: Saric
Lines #: 17 through 19

Comment: The text states that the 2-foot-wide by 12-foot-deep perimeter trench will be excavated to "isolate undocumented below grade utilities." It is unclear how the 2-foot-wide by 12-foot-deep trench will remain open for any length of time without collapsing. The text should be revised to discuss how the trench will be kept open to protect any "live utilities" from damage and to ensure the safety of workers. In addition, all trenching should be conducted in accordance with 20 Code of Federal Regulations Section 1926.650, "OSHA Regulations, Excavating and Trenching Operations." The text should be revised to reflect compliance with these regulations.

Moreover, the rationale for the 12-foot depth for the perimeter trench is not provided. Because most utilities are about 6 feet deep, the need to extend the trench to a depth of 12 feet should be explained. The text should be revised accordingly.

Commenting Organization: U.S. EPA
Section #: 3.2.3 Page #: 3-3
Original Specific Comment #: 2

Commentor: Saric
Lines #: 21 through 23

Comment: The text states that "a written and/or photographic record will be available to the contractor to demonstrate that the utility lines are abandoned and de-energized prior to trenching around the perimeter of the project area." If

TECHNICAL SPECIFICATIONS

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SPECIFIC COMMENT

Commenting Organization: U.S. EPA
Specification #: 02206 Page #: NA
Original Specific Comment #: 1

Commentor: Saric
Line #: NA

Comment: The text describes how the GMA plug will be backfilled. However, backfilling of excavation areas other than the GMA plug is not described in the technical specification. The specification should be revised to state how excavation areas that may create local instability when left open for long periods of time will be backfilled.