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**DISAPPROVAL OF THE OU 2 GEOTECHNICAL SAMPLING AND TESTING
WORKPLAN**

12/09/19

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

REPLY TO THE ATTENTION OF:

C. Williams

DEC 09 1993

Mr. Jack R. Craig
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

HRE-8J

RE: Disapproval of the OU #2
Geotechnical Sampling and
Testing Workplan

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Operable Unit (OU) 2: Geotechnical Sampling and Testing of the Solid Waste Landfill and Proposed On-Site Waste Disposal Cell Workplan. This Workplan was developed to perform geotechnical sampling and testing at the solid waste landfill to provide information for OU 2. However, the objectives of this Workplan are unclear.

Therefore, U.S. EPA hereby disapproves the Workplan pending incorporation of the attached comments.

Please contact me at (312) 886-0992 if you have any questions.

Sincerely,

James A. Saric
Remedial Project Manager

Enclosure

cc: Graham Mitchell, OEPA-SWDO
Pat Whitfield, U.S. DOE-HDQ
Nick Kaufman, FERMCO
Jim Thiesing, FERMCO
Paul Clay, FERMCO

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TECHNICAL REVIEW COMMENTS ON THE "WORK PLAN FOR GEOTECHNICAL
SAMPLING AND TESTING, SOLID WASTE LANDFILL AND ON-SITE
WASTE DISPOSAL CELL FOR OPERABLE UNIT 2 (OU2)"

General Comments

1. Section 1 states that the purpose of the geotechnical sampling is to collect information in order to design one of two remedial alternatives for the Solid Waste Landfill (SWL). These two alternatives are (1) excavation of localized areas in the SWL with high concentrations of radionuclides and capping of the SWL, and (2) removal of all waste in the SWL and disposal of select excavated material in an on-site Resource Conservation and Recovery Act (RCRA) type cell. The work plan should briefly describe the planned disposition of the materials to be excavated from localized areas under alternative 1, and should clarify what is meant by "high concentrations of radionuclides." The work plan should also explain what is meant by "select excavated material" under alternative 2 and what disposition is planned for the rest of the excavated material.
2. Task 1 and Task 2 both propose environmental sampling and analyses. The objectives of the proposed environmental sampling are not presented in the work plan. The work plan should be revised to include the objectives of the proposed sampling and to discuss the manner in which the data will be used in the remedial design (RD).

Specific Comments

1. Task 1, Section 2.2, Page 1-2, Paragraph 3 and Figure 1.
The text states that the observed depth of the interface between the waste fill and undisturbed natural soil is

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indicated in Figure 1. However, Figure 1 does not clearly present this interface. Figure 1 should be revised to match the description in the text.

2. Task 1, Section 3.1.2, Page 1-4, Paragraph 2. General Comment No. 2 applies here and should be addressed.
3. Task 1, Table 1. This table presents the depths of the proposed borings. The rationale for the proposed depths of borings G2-114, G2-115, and G2-116 is not clearly presented. The work plan should be revised to clearly present the rationale for these proposed depths.
4. Task 2, Page 2-3. The work plan contains two copies of Page 2-3. The only difference between the two pages involves the type of cement proposed for grouting the two 75-foot borings. The work plan should be revised to eliminate the inaccurate copy of Page 2-3.
5. Task 2, Section 3.1.2, Page 2-3, Paragraph 6. General Comment No. 2 applies here and should be addressed.