69 4-208.2

CONDITIONAL APPROVAL OF OU 4 REMEDIAL DESIGN WORK PLAN

03/21/95

USEPA DOE-FN
3
OU4

0069

FERNALD

I-1925

MAR 27 9 51 AM '95

FILE: 69

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

MAR 21 1995

REPLY TO THE ATTENTION OF:
HRE-8J

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

RE: Conditional Approval of OU 4
Remedial Design Work Plan

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Operable Unit (OU) 4 Remedial Design (RD) Work Plan. The RD work plan divides the remedial action into two phases: silo residue treatment facility, and final site remediation. The work plan also describes the tasks in detail and provides an adequate schedule.

U.S. EPA does have a few issues that require correction. All Preliminary (30%) Review Packages and Pre-final (90%) Review Packages are "primary" documents as defined in the 1991 Amended Consent Agreement (ACA). The RD work plan must be changed throughout eliminating any reference to "secondary" documents. Also the term "target date" is used throughout the document. This term does not apply to RD activities under the existing ACA. Any reference of this term as applying to the ACA must be eliminated.

Therefore, U.S. EPA approves the RD work plan pending incorporation of adequate responses to the attached comments. U.S. DOE must submit a revised RD work plan with responses to comments within thirty (30) days receipt of this letter.

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

Sincerely,

James A. Saric
Remedial Project Manager
Technical Enforcement Section #1
RCRA Enforcement Branch

Enclosure

cc: Tom Schneider, OEPA-SWDO
Jack Baublitz, U.S. DOE-HDQ
Don Ofte, FERMCO
Jim Thiesing, FERMCO
Terry Hagen, FERMCO

(alle cir)
Letter Response
to I-1925
(2034)

000001

Printed on Recycled Paper

U.S. EPA COMMENTS ON THE OU 4 REMEDIAL DESIGN WORK PLAN

Pages 4-14, 4-21, 4-23, 5-4, 5-10, 5-13, and Table 5-1:

All Preliminary (30%) Review Packages and Pre-final (90%) Review Packages are "primary" documents as defined in the 1991 Amended Consent Agreement (ACA). The RD work plan must be changed throughout eliminating any reference to "secondary" documents, and clarifying that the documents are primary documents.

The term "target date" is used throughout the document. This term does not apply to RD activities under the existing ACA. Any reference of this term as applying to the ACA must be eliminated. U.S. DOE may use target dates, but they have no meaning under the existing ACA when applied to RD activities.

Page 5-13:

The comment response process as defined in the RD work plan is not consistent with the ACA. In the case of Preliminary (30%) Review Packages U.S. DOE must submit a comment response document, that must be approved by U.S. EPA. However, U.S. DOE may proceed with development of the Pre-Final (90%) Review Packages prior to U.S. EPA approval of the Preliminary Packages. All of U.S. EPA's comments with appropriate responses and changed pages must be incorporated into the Pre-Final (90%) Review Package.

TECHNICAL REVIEW COMMENTS ON THE OPERABLE UNIT 4 REMEDIAL DESIGN WORK PLAN, REVISION 0, FEBRUARY 1995 FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 4.1.5.1 Page #: 4-6 Line #: NA
Original Specific Comment #: 1
Comment: The Phase I, Titles I and II preliminary review packages should contain the results of the Phase I and Phase II pilot scale testing. This is critical for the evaluation of process design parameters for the vitrification process. The work plan should be amended to state that the results of pilot testing will be provided.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 4.2.4 Page #: 4-14 Line #: NA
Original Specific Comment #: 2
Comment: The intermediate design meeting is important to determine if the pre-final design will accomplish the objectives of the removal action. The work plan should be amended to include this requirement.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 4.5.3 Page #: 4-40 Line #: NA
Original Specific Comment #: 3
Comment: The preliminary review package should describe the coordination of waste disposal options developed for OU 5 and OU 3. The work plan should be amended to include this requirement.