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**BOILER PLANT/WATER PLANT IMPLEMENTATION PLAN**

11/01/96

USEPA

DOE-FN

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COMMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:

NOV 01 1996

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

SRF-5J

RE: Boiler Plant/ Water  
Plant Implementation  
Plan

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 Operable Unit (OU) 3 Boiler Plant/Water Plant implementation plan.

The implementation plan details the project-specific design and field activities planned for decontamination and dismantlement of the above-grade portions of the Boiler Plant/Water Plant.

The implementation plan appears technically adequate and conforms to standard engineering practices. However, supporting documentation and specifications have not been included with portions of the plan.

Therefore, U.S. EPA disapproves the Boiler Plant/Water Plant implementation plan pending incorporation of adequate responses to the attached comments.

U.S. DOE must submit a revised plan and responses to comments within thirty (30) days receipt of this letter.

(Yockman(d)  
partial  
action response  
to doe-1336-96  
(10089)

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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  
Jack Baublitz, U.S. DOE-HDQ  
John Bradburne, FERMCO  
Charles Little, FERMCO  
Terry Hagen, FERMCO  
Tom Walsh, FERMCO



However, the performance specifications are located in Appendix C of the OU3 RD/RA work plan. The text should be revised accordingly.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 2.3.2 Page #: 11 Line #: 22-25

Original Specific Comment #: 3

Comment: The text states that "since the BP/WP Complex was not a uranium production facility, nor was it ever used as a warehouse for nuclear material, it is anticipated that all demolition debris generated from this project will be eligible for either free release/recycling or placement in the on-site disposal facility (OSDF)." The text should discuss how the particular method of disposal for the demolition debris will be determined.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 4.0 Page #: 41 Line #: 5

Original Specific Comment #: 4

Comment: The phrase "inadequate funding" should be revised to read "adequate funding."

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 4.0 Page #: 42 Line #: NA

Original Specific Comment #: 5

Comment: The remediation schedule in Figure 4.1 shows a start date of February 13, 1997, for dismantlement of the BP/WP Complex. This date is less than 4 months from now, and the plan and specifications still must be submitted for review by U.S. EPA. Therefore, the schedule should be revised to reflect a more realistic start date (see General Comment #1).

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: Appendix B Page #: B-1 Line #: 3-4

Original Specific Comment #: 6

Comment: The text states that "the performance specifications listed on the following page identifies Revision 3 to the specifications that were prepared during the remedial design of the BP/WP Complex." However, the performance specifications indicated identify Revision 1, not Revision 3. This discrepancy should be resolved.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: Appendix B Page #: B-3 Line #: NA

Original Specific Comment #: 7

Comment: Demolition and applicable site work specifications should be listed in the table of contents and included with the performance specifications (see General Comment #1).

In addition, the following items should be considered for applicable performance specifications and included in Appendix B:

- Lead base coating
- Air emissions
- Waste disposal treatment
- Waste disposal disposition

Commenting Organization: U.S. EPA  
Section #: Appendix C Page #: C-1  
Original Specific Comment #: 8

Commentor: Saric  
Line #: NA

Comment: An index of 22 design drawings is shown on Page C-1.

These drawings are designated in the index as Figures C-1 through C-22. However, these figure numbers are not shown on the drawings. The appropriate figure number should be placed on each drawing. Also, demolition drawings should be included rather than the old construction drawings.