



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

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FERNALD
LOG D-0855
2002 NOV 21 A 13 32

REPLY TO THE ATTENTION OF:

NOV 26 2002

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 3B/4B/5 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 3B/4B/5.

The IRDP provides an implementation plan, construction drawings, and technical specifications for conducting remediation in Area 3B/4B/5 in the former production area.

The document does not meet the fundamental requirements of an IRDP. It does not fully delineate the extent of the subsurface contamination for excavation, has not identified the extent of materials exceeding the On-Site Disposal Facility waste acceptance criteria, and requires clarification on several issues.

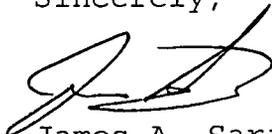
Therefore, U.S. EPA disapproves the Area 3B/4B/5 IRDP pending receipt and incorporation of adequate responses to the attached comments. U.S. DOE must submit a revised IRDP along with responses to comments within thirty (30) days receipt of this letter.

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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
Sally Robison, U.S. DOE-HDQ
Jamie Jameson, Fluor Fernald
Terry Hagen, Fluor Fernald
Tim Poff, Fluor Fernald

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Commenting Organization: U.S. EPA Commentor: Saric
Section #: 4.2.2 Page #: 4-3 Line #: NA
Original Specific Comment #: 19
Comment: This section should be revised to limit the types of
dust suppression agents used to those that do not contain
any petroleum products, lignosulfate, or chloride products.

Commenting Organization: U.S. EPA Commentor: Saric
Table #: 6-3 Page #: 6-25 Line #: NA
Original Specific Comment #: 20
Comment: The data displayed in Table 6-3 should instead be
displayed using a time line software product such as MS
Project.

Commenting Organization: U.S. EPA Commentor: Saric
Appendix #: B Page #: NA Line #: NA
Original Specific Comment #: 21
Comment: The curve number (CN) presented should be revised to
better represent existing conditions in Areas 3B/4B/5. This
area is mostly covered by pavement and concrete foundations.
The CN should also be adjusted for Antecedent Soil Moisture
Condition (AMC) III, which represents wet conditions. Such
adjustments would increase the accumulated runoff (Q) and
the total volume of runoff. If the estimate for the total
volume of runoff is increased, the pumping rate in Basins
4B1 and 4B2 will have to be increased as well.

Commenting Organization: U.S. EPA Commentor: Saric
Appendix #: B Figure #: B1 Line #: NA
Original Specific Comment #: 22
Comment: A legend, scale, and north arrow should be added to
the figure.

Commenting Organization: U.S. EPA Commentor: Saric
Appendix #: C Page #: NA Line #: NA
Original Specific Comment #: 23
Comment: Missing analytical data for soil borings should be
added to Appendix C. See specific comments 5, 7, 8, 11, 13,
and 15.

Commenting Organization: U.S. EPA Commentor: Saric
Appendix #: C Figure #: C-5 Line #: NA
Original Specific Comment #: 24
Comment: The former sump and piping locations are discussed in
the text but are not shown in Figure C-5. This figure
should be revised to show these locations.

Commenting Organization: U.S. EPA
Section #: 16370 Page #: 4
Original Specific Comment #: 50

Commentor: Saric
Line #: NA

Comment: Article 3.2.C should state what type of preservative is to be applied to the shortened end of the pole. The preservative should be applied in accordance with American Wood-Preservers' Association (AWPA) Standard number C4-99 titled Poles-Preservative Treatment by Pressure Processes, as specified in Section 2.1 Table A-4 on Page 3 of 6.