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SITE-WIDE REMEDIAL PLANNING

09/15/95

USEPA DOE-FN
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COMMENTS



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

FERNALD
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SEP 18 10 50 AM '95

SEP 15 1995

FILE: _____
REPLY TO THE ATTENTION OF: _____

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

HRE-8J

RE: Site-Wide Remedial Planning

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) August 18, 1995, letter regarding the proposal for integration of site-wide remedial planning. U.S. EPA has always supported a site-wide approach to remediation at the site, as a project of this magnitude and complexity requires close coordination between activities in the various Operable Units (OU).

Although this letter proposes a sound approach, it lacks much detail concerning implementation of remedial activities and requires further clarification.

U.S. EPA supports an integrated approach to remediation. However, activities must be documented and tracked through the existing OU designations consistent with the 1991 Amended Consent Agreement. The proposed integration requires further clarification and the amendment of Remedial Design and Remedial Action (RD/RA) documents. For example, U.S. DOE has proposed that Decontamination and decommissioning (D and D) of OU 1 facilities and the K-65 Silos be completed under the OU 3 RD/RA process. U.S. EPA may consider handling certain D and D activities under OU 3, but all RD/RA workplans must have schedules and documentation indicating such changes.

Other concerns include it is not clear which OU 1 facilities will be completed under D and D in OU 3 and how and when the underground piping and sumps will be remediated. Also, performing D and D of the K-65 Silos under the OU 3 RD/RA suggests the silos may remain in place in a structurally unstable condition for years. The Silos themselves may be much more like silo waste than the OU 3 materials. Therefore, this may not be an appropriate action and future discussion on this issue is required.

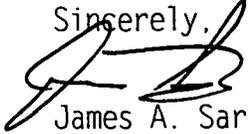
Finally, the schedules of all activities in existing and future RD/RA documents must reflect not only an integrated approach, but one that is consistent with the ten-year cleanup scenario.

(REISING(J))
PARTIAL
ACTION RESPONSE
TO DOE-1365-95
(9112)

Discussions regarding integrated remediation have occurred in several meetings and we look forward to continuing to implement a coordinated, integrated approach to remediation, which is clearly logical and well documented.

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

Sincerely,



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

- cc: Tom Schneider, OEPA-SWDO
- Jack Baublitz, U.S. DOE-HDQ
- Don Ofte, FERMCO
- Charles Little, FERMCO
- Michael Yates, FERMCO
- Terry Hagen, FERMCO