



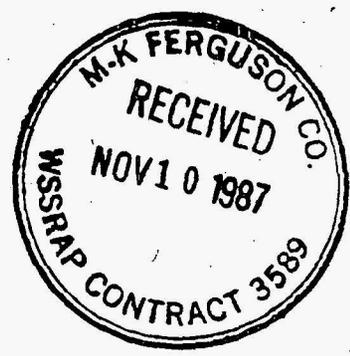
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

3589-87-I-EPA-01

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

NOV 9 1987

Mr. Rodney R. Nelson
U.S. Department of Energy
Weldon Spring Site Remedial
Action Project/Office
Route 2, Highway 94, South
St. Charles, Missouri 63303



Dear Mr. Nelson:

We have reviewed the material you provided on the following interim response actions proposed for the Weldon Spring site:

1. Dismantling of Building 401
2. Dismantling of Building 409
3. Removal of PCB Transformers
4. Debris Consolidation

These actions, as with the four other interim response actions we have reviewed, should be useful in preparing for long-term remedial actions and have positive effects on health and safety and the environment. The documents developed in support of these proposals represent a significant improvement over those developed for the previous actions. Generally, we believe that a more thorough analysis and screening of response alternatives would be appropriate. Also, the documents do not contain sufficient detail of the work to be done to stand alone without the support of the technical specifications and drawings. Other comments and recommendations regarding these interim response actions are discussed below.

Building Demolition

- ° More specifics regarding the handling, storage and ultimate disposal of radioactively contaminated waste should be presented.
- ° The specifications state that "..., if chemically hazardous or toxic material is suspected or encountered, the Contractor shall be immediately notified...". What guidelines will be used by the demolition subcontractor to determine the hazard potential of unknown materials?
- ° The responsibility for determining whether a pollution condition has or will be created should be clearly specified.
- ° The specification does not state the health and safety requirements for the subcontractor.

cc's: R. Lewis
R. Nelson
H. Stewart

IR-100-101-1.03

DOCUMENT NUMBER: 1.02
WSSRAP-101-102

PCB Transformer Removal

In this case, more detail in the site characterization section of the text would be appropriate. For instance, the PCB transformers are categorized as those containing PCBs at concentrations greater than 500 ppm. It may be somewhat misleading not to indicate in the text that the concentrations in these transformers are in excess of 350,000 ppm.

Disposal facilities under consideration for receipt of these wastes must provide certification that they meet the Superfund offsite policy.

Debris Consolidation

It is stated in the description of the response action that one of the response objectives is to "Perform a detailed chemical and radiological characterization of the debris...". The description of the response action and specifications document contain no guidelines, references or information which would allow the subcontractor to complete this objective.

More specifics regarding the handling, storage and ultimate disposal of radioactive contaminated waste are needed.

If there are any questions, please do not hesitate to call.

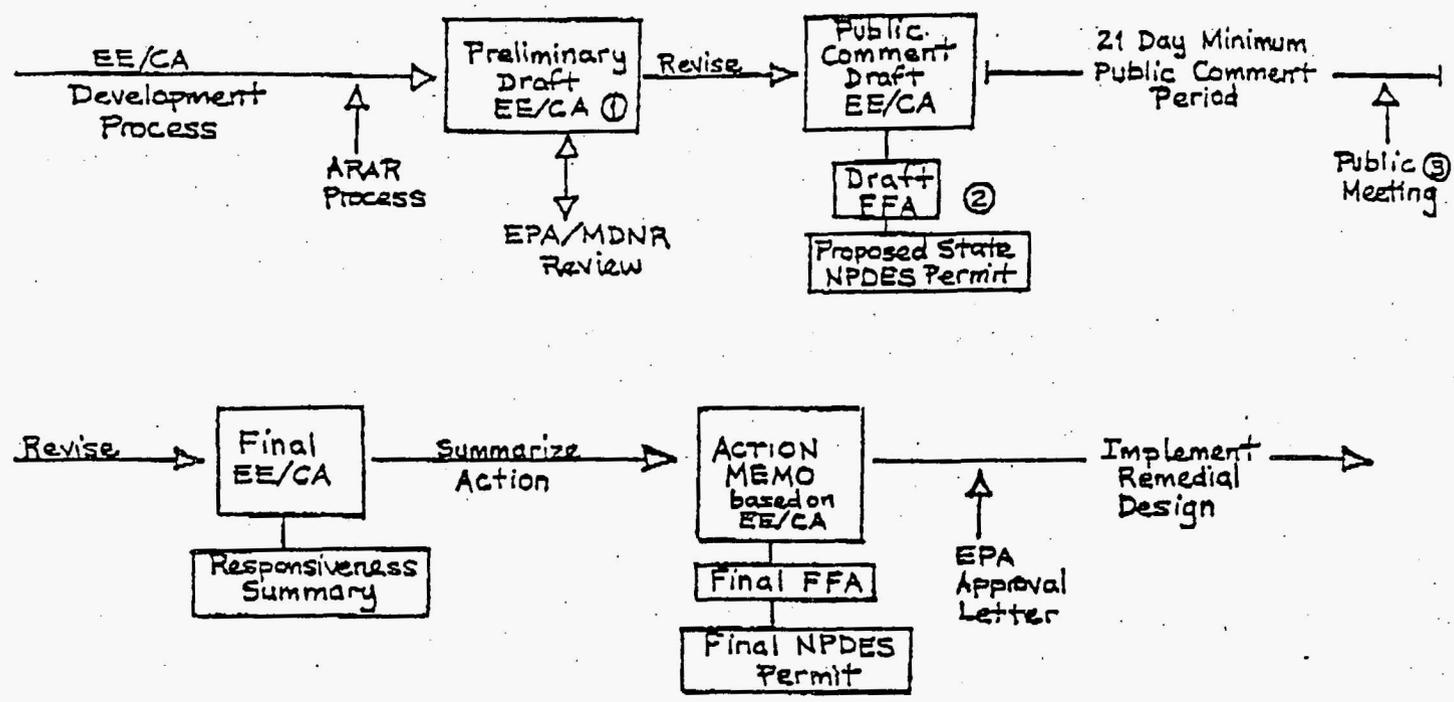
Sincerely yours,



B. Katherine Biggs
Chief, Environmental Review Branch

cc: Dave Bedan, MDNR

PROCESS FLOW CHART FOR DOE'S PROPOSED WASTEWATER TREATMENT AT THE WELDON SPRING SITE



1. Effluent limits are proposed by DOE based on BAT and/or ARARs.
2. It would be desirable to make the FFA and NPDES permit (if necessary) available for public comment along with the EE/CA.
3. Timing of the public meeting can vary, however it is desirable to hold it after the EE/CA is made available for public comment so that it provides an opportunity for oral comment.

DRAFT