



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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REGION 5
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CHICAGO, IL 60604-3590

FERNALD
LOG B-1249

MAY 01 2001

2001 MAY -4 A 10:45

Mr. Johnny W. Reising
United States Department of Energy
Fernald Area Office
P.O. Box 398705
Cincinnati, Ohio 45239-8705

FILE: _____ SRF-5J
REPLY TO THE ATTENTION OF _____
LIBRARY: _____

Subject: Disapproval of Draft Remedial Action Work Plan for Radon Control System (RCS) Phase 1 Operation

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the above-referenced draft Remedial Action Work Plan (RAWP), dated February 2001 and received by U.S. EPA on March 5, 2001. The document provides a plan for implementing and controlling the Phase I RCS and describes the scope, objectives, and criteria for full-scale mockup testing.

In summary, U.S. EPA does not concur with the milestone dates proposed for implementation of the activities described in the RAWP. Also, the text does not discuss the availability of standby power in the event of a power failure.

Regarding the Full Scale Mockup System (FSMS), the RAWP does not discuss how the limited success or failure of one or more "critical aspects of AWR operations" would be addressed. It is also not clear and would seem prudent that the FSMS testing program should permit modifications to the FSMS as needed, hopefully producing a tested and proven retrieval system that is directly transferable for actual waste retrieval.

U.S. EPA therefore disapproves the RAWP. Additional comments are attached. The United States Department of Energy (DOE) and the regulators should resolve these comments and issues prior to DOE submitting a revised RAWP. Please contact me at (312) 886-4591 if you have any questions.

Sincerely,

Gene Jablonowski
Project Manager
Federal Facilities Section
Superfund Division

Attachment

cc: Tom Schneider, OEPA-SWDO
Kim Chaney, U.S. DOE-HDQ
John Bradburne, Fluor Fernald
Terry Hagen, Fluor Fernald
Tim Poff, Fluor Fernald

ENCLOSURE

TECHNICAL REVIEW COMMENTS ON DRAFT
"REMEDIAL ACTION WORK PLAN FOR
RADON CONTROL SYSTEM (RCS) PHASE I OPERATION"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

(One Page)

TECHNICAL REVIEW COMMENTS ON DRAFT
 "REMEDIAL ACTION WORK PLAN FOR
 RADON CONTROL SYSTEM (RCS) PHASE I OPERATION"

GENERAL COMMENTS:

Commenting Organization: U.S. EPA
 Section #: 3 Page #: Not applicable (NA) Line #: NA
 Original General Comment #: 1

Comment: The RAWP does not discuss how a limited success or failure of one or more "*critical aspects of AWR operations*" would be addressed. It is also not clear and would seem prudent that the FSMS testing program should permit modifications to the FSMS as needed, hopefully producing a tested and proven retrieval system that is directly transferable for actual waste retrieval.

Commenting Organization: U.S. EPA
 Section #: 4 Page #: 23 Line #: NA
 Original General Comment #: 2

Comment: Considering the closeness of the August 1 and 30, 2002 milestone dates, and the aggressiveness of such a schedule, U.S. DOE and the regulators should discuss and agree upon an appropriate set of milestone dates.

SPECIFIC COMMENTS:

Commenting Organization: U.S. EPA
 Section #: 1.3 Page #: 3 Line #: NA
 Original Specific Comment #: 1

Comment: This section discusses control of RCS Phase I operation. However, the text does not discuss whether standby power will be available in the event of a power outage during operation of the RCS. The text should be revised to address emergency procedures for power outages.

Commenting Organization: U.S. EPA
 Section #: 1.3.12.1 Page #: 11 Line #: NA
 Original Specific Comment #: 2

Comment: The text states that "during RCS Phase I operation, condensate will be sampled and transferred to the FEMP AWWT facility after verification that the liquid meets the AWWT acceptance criteria." It is not clear what will be done with this condensate if it does not meet the Advanced Wastewater Treatment (AWWT) acceptance criteria. The text should be revised to clarify this matter.

Commenting Organization: U.S. EPA
 Section #: 1.4.1 Page #: 12 Line #: NA
 Original Specific Comment #: 3

Comment: The text states that "the monitor will be located after a sufficient length of straight duct downstream of the HEPA filters to ensure that the distribution of any remaining particulates in the stack is uniform." The text then states that "the probe assembly fits into the stack and has the capacity for measuring stack flow and for withdrawal of an isokinetic sample." However,

it is not clear (1) whether the probe will be located in the duct or in the stack (2) whether a sample will be collected from the stack or the duct, and (3) how the flow rate of the sample will be kept the same as the flow rate in the duct unless a sampling pump is used. The text should be revised to clarify these matters.