



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

3736

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

FERNALD

LOG B-1603

JUN 21 2001

2001 JUN 25 A 10:14

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

FILE: SRF-5J  
REPLY TO THE ATTENTION OF

LIBRARY: \_\_\_\_\_

RE: A2,P1 Perimeter Area  
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 (IRDP) package for the Area 2, Phase I (A2,P1) non-waste units perimeter area.

This IRDP provides the overall plan for remediating the soil and at- and below-grade debris in the non-waste units perimeter areas surrounding the former A2,P1 southern waste units.

U.S. EPA has identified several deficiencies with this submittal, primarily regarding scheduling and sequencing of activities. The IRDP does not provide milestone dates for certification design letters or other certification activities.

Therefore, U.S. EPA disapproves the IRDP for the A2,P1 perimeter area. U.S. DOE must submit responses to comments and a revised document with thirty (30) days receipt of this letter.

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  
Kim Chaney, U.S. DOE-HDQ  
John Bradburne, Fluor Fernald  
Terry Hagen, Fluor Fernald  
Tim Poff, Fluor Fernald





Section #: 3.6

Page #: 3-14

Line #: NA

Original Specific Comment #: 3

Comment: This section discusses the planned excavation sequence.

As noted at various points in the implementation plan, this sequence is quite complex. Many tasks cannot occur until one or more other tasks, such as excavation of an area, construction of a berm, removal and rebuilding of a roadway, and so on, have been completed. The implementation plan should be revised to provide a critical path diagram showing all these tasks interactions, including interactions that are outside the scope of the plan.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.6

Page #: 3-14

Line #: NA

Original Specific Comment #: 4

Comment: The text states that the initial phase of work (Part One) is scheduled for summer 2001 and that the remaining work (Part Two) is expected to be performed beginning in fiscal year 2004. The text goes on to state in Section 3.7 that precertification and certification activities for the perimeter areas will be established after site funding and scheduling issues are resolved. It is therefore unclear when precertification and certification activities will be completed for Part One remediation areas. Given the length of time currently anticipated between the Part One and Part Two work, precertification and certification activities for Part One areas should be conducted upon completion of the Part One work instead of waiting for completion of the Part Two work. At a minimum, the text should be revised to include a schedule for submittal of a certification design letter and certification report for the perimeter areas to be remediated as part of the Part One work.