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DOE-14-0005



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 4
 ATLANTA FEDERAL CENTER
 61 FORSYTH STREET
 ATLANTA, GEORGIA 30303-8960

December 19, 2013

Mr. John Michael Japp
 Federal Facility Agreement Manager
 Department of Energy
 Oak Ridge Operations Office
 P.O. Box 2001
 Oak Ridge, Tennessee 37831

SUBJ: Limited Phase I Site Characterization Plan for the
 Proposed Environmental Management Disposal Facility (EMDF)
 October 22, 2013
 DOE Oak Ridge Reservation
 Oak Ridge, Tennessee

Dear Mr. Japp:

The Environmental Protection Agency (EPA) completed its review of the documented that was provided to the State for review per their request and was subsequently provided informally to EPA for our information. This plan is for a limited effort to characterize site hydrogeologic conditions specifically requested by the State and the document is not undergoing a formal review for approval. Use of data obtained in this effort for the Remedial Investigation should include quality assurance confirmation and documentation that the data is of sufficient quality to support environmental evaluations and decisions. The limited plan refers to Extensive Phase II characterization effort that is not clearly described and expected to be conducted after the approval of the Remedial Investigation/Feasibility Study. A subsequent Phase II effort to more extensively characterize site conditions should include a data quality objectives scoping effort among all three parties to the Federal Facility Agreement (FFA) and the draft plan should be formally reviewed and approved in accordance with the FFA.

This letter also identifies two issues that should be considered during the Phase I effort.

1. Section 1.1 of the limited characterization plan states that EPA rejected the White Wing Scrap Yard and West Bear Creek Valley Sites. This statement is inaccurate. EPA requested that the East Bear Creek Valley Site not be rejected in screening of alternatives. Enclosed please find the email dated November 17, 2011 from Crane to Darby documenting EPA's position on the matter during scoping of the document deliverable for formal review.
2. EPA's Specific Comment 21 on the 2013 Phased Construction Completion Report for the existing CERCLA Landfill requested a replacement well for GW-923 that is located in an area that would be well suited for monitoring groundwater conditions in between the existing and proposed new landfill. This limited characterization plan should consider a new monitoring well in this general area.

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If you have any questions regarding this matter, please call me at (404) 562-8546.

Sincerely,



Jeffrey L. Crane
FFA Project Manager
KY/TN Federal Oversight Section
Federal Facilities Branch
Superfund Division

Enclosure

cc: Curt Myers, TDEC
Jason Darby, DOE ORR
SSAB



Re: D0 FFS for CERCLA waste management

Jeff Crane to: Darby, Jason Daniel

Cc: Curt Myers, roger.petrie

11/17/2011 03:23 PM

From: Jeff Crane/R4/USEPA/US
To: "Darby, Jason Daniel" <DarbyJD@oro.doe.gov>
Cc: Curt Myers <Curt.Myers@tn.gov>, roger.petrie@tn.gov

Jason,

Based on a cursory review of the subject document EPA received in October 2011, the following comments of some significance are offered for consideration to address/include in the D1. EPA expects a full review to be conducted on the D1 submission. Additional D1 comments can be anticipated and the full FFA review cycle and time-frame is expected.

D0 FFS Comments

Executive Summary - CDF is a good concise name of the potential operable unit and would clearly differentiate this OU from the EMWMF.

Section 2.1.2, p. 2-3 - this section should clearly describe the specific CERCLA waste types planned to be sent to the potential new on-site facility, including RCRA Listed Wastes. A lessons learned discussion based on the EMWMF design and operations would be helpful. Waste volume estimates per specific waste category (e.g., RCRA Listed Wastes) may be helpful. The EMWMF ROD provided an estimate of listed waste. An update of this estimate may be useful if new data supports such an update.

Section 3 - Although this evaluation is not based on evaluating the baseline risk of no action vs other actions, risk evaluations of the long-term exposure to waste placed on-site is a part of the evaluation and relevant. If risk of on-site disposal is addressed in the context of Appendix D, maybe this section should summarize why the Appendix D risk evaluation is relevant and how it differs from a typical baseline risk assessment. Also, this section could summarize the threshold criteria discussions in the subsections of Section 7 (e.g. 7.1.1, 7.2.1.1).

Section 6.2, p. 6-1 - In the 3rd paragraph, add two additional elements that are critical to ensuring long-term protection: 1) Construction/Operations/Monitoring; 2) Closure/Post-Closure/Institutional Controls.

Sections 6 and 7 and Appendix C - Sections 6 and 7 do not include on-site locations in closer proximity to the existing landfills in BCV. Locations 9 and 8 do not represent areas that could be considered "brownfields areas." As was requested during scoping meetings, DOE should include an alternative for detailed analysis of a candidate site located in close proximity to the Bear Creek Burial Grounds and the EMWMF "brownfields" area. A new CERCLA landfill in closer proximity to the existing landfills would better enable opportunities to share infrastructure support of multiple response actions in this area, particularly contaminated water treatment capacity, and reduce overall EM cleanup costs. Finally, a primary reason cited by DOE in the D0 for not collocating a new landfill in this area appears to be due to the location of NTs. A lesson learned from the EMWMF was the need to design for groundwater displacement from an NT prior to construction rather than as a retro-fit after construction. An additional lesson learned was that the discharge from the former NT french drain yields an alternate monitoring configuration for leakage that may improve overall leakage response times.

In summary, the following siting and response action factors:

- The EMWMF "brownfield" siting factor (the EMWMF ROD, p. 2-20 site selection factor - "...identification of potentially suitable "brownfield" sites";
- The lessons learned from the NT-4 impacts on the EMWMF design/construction/monitoring; and,
- The potential benefits of overall reduced costs by sharing the costs of the BCV response action

Infrastructure in a "brownfields" setting located near the BCBGs and the EMWMF warrant DOE inclusion of an alternative that includes at least one of the CDF candidate sites 1-7, or a similar variation thereof.

Jeff Crane
crane.jeff@epa.gov (404) 562-8548

"Darby, Jason Daniel" ~~Jeff/Curt: We have the D0 FFS for CERCLA~~ 09/22/2011 02:00:50 PM

From: "Darby, Jason Daniel" <DarbyJD@oro.doe.gov>
To: Jeff Crane/R4/USEPA/US@EPA, Curt Myers <Curt.Myers@tn.gov>
Date: 09/22/2011 02:00 PM
Subject: D0 FFS for CERCLA waste management

Jeff/Curt,

We have the D0 FFS for CERCLA waste management ready to provide to y'all. It's not a D1 so the normal protocol on number and type of copies does not apply. Should we provide hardcopies, electronic or FTP site?

Jason D. Darby
Project Manager
USDOE
865-241-6343
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