Copy to:
Rod
Steve
Bill
Glen
Ken
D. Coyne

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

November 13, 1987

M-K FERGUSON CO.
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NOV 30 1987
WSSRAP CONTRACT 3589

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:

Enclosed is a copy of the comments we received from the Missouri Department of Natural Resources for the following four interim response actions:

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

Any questions on these comments should be directed to David Bedan. To date, we have not received any other comments.

Sincerely yours,

Katie

B. Katherine Biggs
Chief, Environmental Review Branch

Enclosure

cc: David Bedan

001893
11-30-87

DOCUMENT NUMBER: I 00-104-1.01

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

NOV 18 1987

OFFICE OF
THE REGIONAL ADMINISTRATOR

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 Department of Energy's (DOE) proposals for the following four interim response actions:

- Dismantling of Building 401,
- Dismantling of Building 409,
- Removal of PCB Transformers, and
- Debris Consolidation.

Our comments on these proposals were sent to you earlier. You were also provided comments by the Missouri Department of Natural Resources (MDNR). No comments from the public were directed to the Environmental Protection Agency (EPA) and according to our records, there has been no public comment directed to MDNR or DOE.

We are in agreement these actions should proceed to ensure worker safety and reduce the further release of contaminants from this site. The EPA hereby approves these actions under the condition that the comments earlier provided by EPA and MDNR are adequately addressed. The MDNR has notified me they also concur with these actions. Please provide copies of any summary reports for these actions to EPA and MDNR.

We also received copies of the interim response action for construction of the Ash Pond Dike. We will provide any comments on this proposed action within the agreed upon 21-day comment period. We are most pleased to see that activities are underway to stabilize the site and reduce contaminant release.

Sincerely yours,

Morris Kay
Regional Administrator

cc: Dr. Fred Brunner, MDNR

001872
11-23-87
Rapid review 11-20-87

4711

DEC 09 1987

Ms. B. Katherine Biggs
United States Environmental
Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Dear Ms. Biggs:

USEPA COMMENTS ON INTERIM RESPONSE ACTIONS (IRA'S)

Enclosed is our response to the comments contained in your letter of November 9, 1987, regarding the following interim response actions:

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

We anticipate that this will adequately resolve the issues raised. We intend to proceed with action on these items in accordance with the enclosure.

If you have any questions, please give me a call.

Sincerely,

ORIGINAL SIGNED BY:
R. R. NELSON

Rod Nelson
Project Manager
Weldon Spring Site
Remedial Action Project

Enclosure:
As stated

cc: Dave Bedan, MDNR

PEER:JCoyne:x41:mw:12/04/87: (c:EPA-IRA'.Ltr.)

CONCURRENCES

RTG SYMBOL	INITIALS/SIG.	DATE
PEER	J. Coyne	12/7/87
CE-541	R. Nelson	12/9/87

RESPONSIVENESS SUMMARY

B. Katherine Biggs letter to Rodney R. Nelson, dated November 9, 1987 re:

Interim Response Actions

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

General

Comment: Generally, a more thorough analysis and screening of response alternatives would be appropriate.

Response: This comment was reviewed with the EPA (telecon from Rod Nelson to Dan Wall dated 11-17-87). The EPA agreed that while additional analysis and screening is not required for the four (4) IRA proposals addressed herein, future proposals such as the Ash Pond Isolation Dike will present a more thorough analysis of response alternatives.

Comment: 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.

Response: Technical specifications and drawings will continue to accompany the IRA proposal packages submitted for review.

Building Demolition

Comment: Specifics of handling, storage, and ultimate disposal of radioactively contaminated waste should be presented.

Response: Radioactively contaminated waste from demolition of Buildings #401 and #409 will be segregated and stored on-site in a dry, concrete floored building, Building #434 and/or Building #406. Ultimate disposal will be in accordance with the RI Plan/EIS. Specifics of handling this waste will be covered in the Contractor's operational work plan which will integrate the specification and drawings, the WSSRAP Construction Safety and Health Management Program, applicable WSSRAP Standard Operating Procedures and Plans along with the subcontractor dismantling plan. This work plan will be finalized prior to the Subcontractor(s) starting demolition work.

response,txtsheil