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CONCURRENCES	
RTG SYMBOL	PEER
INITIALS/SIG.	J. Coyne
DATE	11/9/87
RTG SYMBOL	CE-541
INITIALS/SIG.	R. Nelso
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Mr. David E. Bedan
Missouri Department of
Natural Resources
Post Office Box 176
Jefferson City, Missouri 65102

Dear Mr. Bedan:

MISSOURI DNR COMMENTS ON INTERIM RESPONSE ACTIONS (IRA'S)

Enclosed is our response to the comments contained in Dr. Frederick A. Brunner's letter of October 26, 1987, regarding the following interim response actions:

1. Electric Power Line and Pole Removal
2. Overhead Piping/Asbestos Removal
3. Army Reserve Area Vicinity Property No. 7
4. Disposal of Containerized Chemicals

We anticipate that this will adequately resolve the issues raised and we intend to proceed with these actions in accordance with the enclosure.

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

Sincerely,

ORIGINAL SIGNED BY:
R. R. NELSON

R. R. Nelson
Project Manager
Weldon Spring Site
Remedial Action Project

Enclosure:
As stated

cc: B. K. Biggs, USEPA
E. Brown, FLW
w/enclosure

FILE NUMBER: _____

PEER:JCoyne:x41:mw:11/9/87: (c:DNRCom.Ltr.)

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RESPONSES TO MDNR COMMENTS
ON INITIAL FOUR (4) IRA PROPOSAL PACKAGES

I. Removal of Overhead Piping and Asbestos Removal

Comment: The DNR states that Missouri has adopted the Federal Clean Air Act standards for asbestos handling and has been delegated responsibility for implementing these standards and that asbestos and piping removal activities are subject to both the Missouri Air Conservation Law and the Missouri Solid Waste Management Law. DNR recommends that we maintain close contact with the Air Pollution Control Program to insure compliance with these standards.

Response: DNR Air Pollution Control Program office will be kept apprised of plans for asbestos removal work at the Weldon Spring Site. The WSSRAP will comply with requirements for disposal of asbestos and other demolition wastes in accordance with the Missouri Solid Waste Management Act.

Comment: The DNR has determined that the overhead piping and asbestos should be handled as a "special waste".

Response: We are proceeding to include the Special Waste Disposal Request form in the Request for Proposal for this work.

Comment: The DNR states that onsite handling of asbestos and other demolition waste may also be subject to Missouri Solid Waste Management Law requirements and requests that we furnish information on the size, design, location of the staging area and the amounts and methods of handling for the materials to be handled in the materials staging area.

Response: Information on handling and staging of the materials will be furnished to the DNR prior to issuing requests for proposals for this work.

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II. Disposal of Containerized Chemicals

Comment: Define specific levels at which the containerized wastes are considered radioactive.

Response: WSSRAP is developing concentration levels for wastes containing natural uranium for review and acceptance by concerned federal agencies. We will advise the DNR of this determination as it comes available. Until this determination is made we will retain on site containerized chemical materials which contain detectable levels of radioactive materials as determined by our onsite instruments.

Comment: What are removal plans for underground storage tanks on site?

Response: The underground tanks at the WSS have been sampled and found to contain only rainwater with trace amounts of motor fuel. The drainage and removal of the underground tanks is not part of the containerized chemical inventory and removal IRA Scope of Work. They may be removed as part of a subsequent IRA.

Comment: The document appears to be a generic outline for removal of waste. Items such as disposal facilities, transporters, waste characterization procedures, waste treatment procedures, etc. are not detailed.

Response: The IRA documentation represents a request for proposal to be sent to potential removal subcontractors. The responsibility for developing a detailed work plan addressing such items as disposal facilities, transporters, waste characterization procedures, waste treatment procedures, etc. rests with the successful bidder. A requirement of the subcontract specification is the development of the subcontractor's work plan which must be approved by the WSSRAP before the work may begin. The DNR will be provided a copy of the subcontractor work plan when it becomes available for review. The WSSRAP office requests that the State provide a timely review (14 calendar days) to avoid delaying the subcontractor's

efforts. The State will be given 2-weeks notice of the interval at which time the work plan will be available for review.

III. Remedial Action on Army Vicinity Property

Comment: DNR states that the interim measure suggested is lacking in detail and should contain information on:

- How the removal is to be conducted?
- How and where excavated material will be contained?
- Health and safety plans for the work.
- Why is DOE recommending only remedial action for this vicinity property?
- When does DOE plan to remove the additional contamination in the other six locations?

Response: The technical requirements, i.e. specifications, drawings, special conditions, etc., did not accompany this IRA package for review as they were incomplete at the time of package submittal. Requirements for removal, containment and storage, and health and safety plans will be included in the Request for Proposal for this work.

The very small quantity (less than two cubic yards) of contaminated material can be removed manually and will not require any significant mechanical equipment. The technical specification developed for this work will provide required direction to the subcontractor.

We plan to excavate and place the contaminated soil in 55 gallon drums. The drums will be sealed, placed and stored in a dry, concrete floored building at the Weldon Spring Site awaiting final disposition. Total volume is anticipated to be less than 5 drums.

No unusual hazards are anticipated for this activity. The contract will require workers to abide by the WSSRAP Environmental, Safety and Health Plan.

DOE proposes performing remedial action of Army Vicinity Property No. 7 to remove contamination from an area where the Army has imminent construction plans. Cleanup of other vicinity properties, containing larger volumes of contaminated material, will be recommended based upon urgency of cleanup needs and development of storage facilities on the WSS.

Remediation of the remaining Army Vicinity Properties is tentatively scheduled for the first and second quarters of fiscal 1989.

IV. Power Line/Pole Removal

Response: The plan should address PCB contamination in regard to pole removal if transformers/ capacitors containing PCB's were mounted on them.

Comment: The power poles to be removed in the IRA were specifically not associated with transformers containing PCBs. Those poles which have oil-cooled transformers mounted on them will be surveyed and removed at a later date.