4/11

NOV 10 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 October 8, 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. 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

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

Enclosure:
As stated

cc: D. Bedan, MDNR
E. Brown, FLW
w/enclosure

DOCUMENT NUMBER: I-600-604-1.02

PEER:JCoyne:x41:mw:11/8/87 (re:IRACom.Ltr.)

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CONCURRENCES	
RTG SYMBOL	PEER
INITIALS/SIG.	J. Coyn
DATE	11/9/8
RTG SYMBOL	CE-541
INITIALS/SIG.	R. Nels
DATE	11/9/8
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RESPONSES TO USEPA REVIEW COMMENTS
ON IRA PACKAGES

Cleanup of Vicinity Property No. 7, Army Reserve Area

Comment: The proposal to cleanup this vicinity property calls for excavating the contaminated area to a depth of six (6) inches or where the radium concentration is below 15 pCi/g and then backfilling with clean material. The EPA suggests that while its criteria for residual radium in soil is satisfied by this approach, that we consider removing additional soil to reduce the concentration to below 5 pCi/g. As the area is small, little additional excavation would be required.

Response: Subsequent to the preparation of the IRA package for Army Reserve Vicinity Property #7, the Deparment of Army requested that the area not be backfilled upon completion of the cleanup as proposed by the DOE. The DOE will leave the excavation area open and apply the suface criteria of 5 pCi/g to this particular vicinity property.

Disposal of Containerized Chemicals

Comment: It is suggested that the specifications for this work might be strengthened by adding waste characterization procedures into Section 2.0 (Scope) of the document. The procedures are those which may be required under 40 CFR 260-268, or others required by the permit held by the Treatment, Storage and/or Disposal Facility.

Response: Procedures required in 40 CFR 260-268 will be referenced in Section 2.0 of the Request for Proposal. In addition, it will be emphasized that all waste characterization procedures which are required by the successful bidder's treatment, storage and/or disposal facilities permit must be satisfied. It will be required that these procedures (if applicable) be presented in the subcontractor's work plan.

Comment: EPA recommends that the specific subcontractor qualifications and experience in handling known and unknown potentially hazardous wastes be defined in the document.

DOCUMENT NUMBER: F-600-604-102

Response: We are in agreement with the EPA that the Request for Proposal should contain subcontractor qualifications and experience clauses. The appropriate clauses will be added to the document.

Comment: The EPA recommends that the specification require the successful bidder to identify the specific waste disposal facilities which will accept the containerized chemical waste, in the work plan phase.

Response: The specification will be modified to include provision for certification by the subcontractor that the waste disposal facilities meet the requirements when hazardous wastes are involved. The land disposal ban provision of RCRA will also be addressed as part of the subcontractor's work plan.

General

Comment: The EPA review states that there is one(1) deficiency common to the four proposals and that is that plans for onsite handling and storage of radioactive contaminated materials should be developed.

Response: Plans for onsite handling and storage of radioactive contaminated materials are currently being finalized and will be provided under separate cover.