3589-87-I-DOE-241

Department of Energy
Oak Ridge Operations
Weldon Spring Site
Remedial Action Project Office
Route 2, Highway 94 South
St. Charles, Missouri 63303

December 21, 1987

M-K FERGUSON CO.
RECEIVED
DEC 29 1987
WSSRAP CONTRACT 3589

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

Dear Ms. Biggs:

MDNR COMMENTS ON INTERIM RESPONSE ACTIONS (IRA'S)

Enclosed is our responsiveness summary for the comments contained in Dave Bedan's letter of November 12, 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,

for Rod Nelson
Project Manager
Weldon Spring Site
Remedial Action Project

Enclosure:
As stated

cc: Dave Bedan, MDNR, w/enclosure
Jack Hammond, MK-F, w/o enclosure

RESPONSIVENESS SUMMARY

B. Katherine Biggs letter to Rodney R. Nelson, dated 11-13-87 re: MoDNR comments on:

Interim Response Actions

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

1. Dismantling and Disposal of Buildings #401 and #409

Comment: The DOE and its Contractors should develop and maintain close contact with the Missouri Air Pollution Control Program to assure compliance with Missouri Air Conservation Law and Missouri Solid Waste Management Law in carrying out these activities.

Response: The DOE and its subcontractor(s) will continue to keep the DNR Air Pollution Control Program office apprised of plans for work at the site involving removal, handling, storage, and/or disposal of asbestos materials.

Comment: Missouri Solid Waste Management Law requires demolition waste to be disposed of in a permitted sanitary or demolition landfill. Asbestos waste must be disposed of in a permitted sanitary landfill.

Response: The Specifications for this work will require that asbestos and other demolition debris be disposed of in accordance with the requirements of the Missouri Solid Waste Management Law.

Comment: DNR maintains that because of the special concerns relating to the volume of waste and to the possible contamination of the asbestos and the other demolition material with hazardous wastes or radioactive wastes, these materials should be handled as "special wastes".

Response: The DOE concurs that there are special circumstances that require handling of asbestos as "special waste". Specifications for the asbestos subcontracts contain this provision.

The pending subcontracts contain the "special waste" forms which will be included in the

subcontract work packages as matter of comity. Should subcontract efforts, cost or progress on these IRA's be impacted by this provision, the DOE will revisit this issue with the MDNR.

Comment: The DNR cannot approve the disposal of the asbestos and other demolition wastes until a procedure is in place to assure us that no radioactive or hazardous materials are being disposed of in Missouri solid waste landfills.

Response: Release standards are in place for controlling release of the rubble off site. Radiological survey and release plans will be developed for each work package involving removal and off-site disposal of materials to insure compliance with the standards.

Comment: DOE should provide justification for its policy to dispose of all non-radioactive building waste off site.

Response: The DOE policy is based on volume reduction and cost effectiveness. By disposal of nonradiological material in a sanitary or demolition landfill, there is a reduction in the amount of material (Volume Reduction) that will be encapsulated in any disposal cell. Secondly, costs for on-site disposal cells are high in comparison to disposal in sanitary or demolition landfills. Also, as an aside to the technical and cost effectiveness issues, the DOE currently has funding available. The site is still to be fully characterized and to delay demolition and disposal of clean materials would not allow these funds to be utilized and also would lead to overall slipping of the schedule.

2. <u>Removal of PCB Transformers</u>

Comment: MDNR recommends that if Alternative #5 is used, during the "flushing" process care should be taken to contain any spilled material. Also, "flushing" should be continued until PCB levels are less than 2 ppm, if transformer and switch carcasses are going to be disposed into a permitted sanitary landfill.

Response: The subcontract specifications for this interim response action include spill control provisions for draining and flushing operations. Spill control pans are specified to collect any spilled liquids. PCB transformers and other electrical

equipment which have been drained and flushed, as stated in the specifications, will be disposed of at an EPA approved PCB disposal facility, not a sanitary landfill.

Comment: If the PCB liquids are being transported to a disposal facility within Missouri, a licensed hazardous waste transporter must be used. If the PCBs are being transported to an out-of-state facility MDNR recommends that a licensed transporter be used although it is not a requirement.

Response: The specifications state that the transporter of the PCB liquids and drained electrical equipment shall be licensed.

Comment: In the preamble to 40 CFR 761, unless otherwise tested, all dielectric transformers are assumed to contain 50-500 ppm PCB, therefore untested transformers (22, 32, and 45) should be "flushed" with other transformers.

Response: The three transformers which have not been sampled for PCBs will be treated as PCB-contaminated units unless future sampling is performed to otherwise classify them as non-PCB transformers or PCB transformers. Irrespective of the classification, these units will be drained and flushed on site, unless the disposal facility intends to incinerate them as intact units, as indicated in the subcontract specifications.

Comment: External pad, poles, and adjacent areas should be tested to determine if PCB contamination exists.

Response: Additional sampling for PCB contamination, in areas from which the PCB-containing transformers and other electrical components are to be removed, is planned as part of future chemical characterization activities at the site.

3. Debris Consolidation

Comment: The storage of solid waste on site may be subject to the requirements of the Missouri Solid Waste Management Law. Please contact the Missouri Waste Management Program for assistance in determining whether these requirements apply.

Response: An interim response action proposal is being prepared which will present plans for materials staging and interim storage of solid waste on site. We will contact the Missouri Waste Management Program Office for assistance in determining applicability of the Missouri Solid Waste Management Law to this work.