



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SLDS Administrative Record

REGION VII 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

1991 CCT 10 FII 4 9808171010

OCT 08 1991

Mr. David Adler
Former Sites Restoration Division
Department of Energy
Oak Ridge Operations
P.O. 2001
Oak Ridge, TN 37831

Dear Mr. Adler:

This is to inform you that we have reviewed the DOE responses to EPA's comments on the Draft Work Plan, and the incorporation of those comments into the Final Draft Work Plan. We have found no need for further revision of the Work Plan and in accordance with the Federal Facility Agreement (FFA), consider the July 1991 version of the Work Plan to be "Final" as described in the FFA. However, although we see no need for another revision of the Work Plan, there continue to be several EPA comments on the draft Work Plan which have not yet been adequately addressed. We are therefore requesting that DOE provide additional information with regard to the following comments from our May 31, 1991 review of the draft Work Plan:

General Comments

- 1. General Comment 2 Although DOE's response indicates that an explanation of the sampling location identification system has been provided, we could find no such explanation on the Final Draft Work Plan. Please identify the location of the explanation or, alternatively, provide that explanation in a follow-up letter.
- 2. Regarding those questions concerning the adequacy of RI efforts to date in defining the extent of contamination, we will reserve any comments pending our review of the RI report.
- 3. We still have not received the Quality Assurance Project Plan promised at our June 1991 meeting.
- 4. We still have not received the comparison of environmental concentrations versus exposure rates as discussed at our June 1991 meeting.



5. The DOE response notes that several investigative efforts appear to be underway. As we discussed at our June meeting, EPA should be notified of additional field work, and the workplans prepared in advance of the field work should be submitted for our review under the terms of the FFA.

Specific Comments

- 1. p. 2-21 Because of the scale chosen, the new hydrograph in Figure 2-11 is unreadable. Please expand the scale, eg., by the elimination of water level elevations greater than 400 ft msl, so that a less crowded presentation of the data is possible.
- 2. p. 2-28 Although sources of height regulations were added, the response still does not answer the question. Please identify the specific height limitations which must be complied with.
- 3. p. 2-31 Figure 2-5 still does not identify the specific burial location on the western portion of SLAPS.
- 4. p. 2-107 Although DOE provided a definition for the word "elevated", the bigger question has still not been answered, i.e., why are several properties in Table 2-35 which contain contaminant levels above DOE guidelines, not identified as having elevated contaminant levels in the text on page 107?
- 5. p. 2-130 Groundwater contours have not been added to the copy of Figure 2-52 we received.
- 6. p. 2-161 The comment is only partially addressed. Any information DOE has on the contents of the old landfill should be provided.

Should you have any questions, please contact me at FTS 276-7709 or (913) 551-7709.

Sincerely yours

Gregory D. McCabe Site Assessment and

Federal Facility Section

Superfund Branch

Waste Management Division

cc: David Bedan, MDNR