



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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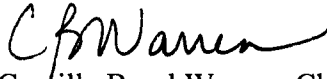
Mr. William M. Pardue
Chair, Oak Ridge Environmental Management
Site Specific Advisory Board
P.O. Box 2001 / EW-91
Oak Ridge, TN 37831

Dear Mr. Pardue:

The Environmental Protection Agency (EPA) has reviewed the Oak Ridge Environmental Management Site Specific Advisory Board's (Board's) *End Use Recommendation for the Disposal Areas in Melton Valley* (R010798.5). The EPA appreciates the opportunity to review recommendations made by the Board and to provide feedback on those recommendations. In the enclosure, EPA has provided general feedback regarding this recommendation. Additionally, EPA has enclosed its comments to the Department of Energy on the draft Feasibility Study for Melton Valley.

We would be happy to discuss our feedback on the Board's recommendation at your convenience. I may be contacted at 404/562-8519.

Sincerely,


Camilla Bond Warren, Chief
DOE Remedial Section
Federal Facilities Branch

Enclosures

cc: Earl Leming, TDEC
Rod Nelson, DOE

**EPA Comments
SSAB's
End Use Recommendation for the Disposal Areas in Melton Valley**

The Board recommends that the future land use of the disposal areas in Melton Valley be considered "restricted." "Such land use would limit access and surface use to monitoring and maintenance activities; no soil excavation or surface water or groundwater use would be permitted; ownership would remain with the federal government."

1. EPA agrees that the reasonable future land use for the burial complexes in Melton Valley (SWSAs 4, 5, and 6) is waste management (maintenance and monitoring). Under this type of future use, controls would be required to preclude other uses of these land parcels. In addition, EPA is considering including the pits and trenches area as part of this waste management zone since it is bounded on three sides by shallow land disposal facilities and since it also contains significant source areas that are unlikely to be returned to more beneficial uses. With a future land use of waste management, EPA agrees that access would be limited and that soil excavation would be a controlled and well planned process should the need for soil disturbance arise.

2. EPA does not agree with the general statement that no surface water or groundwater use would be permitted. As discussed in the Preamble to the National Contingency Plan, EPA expects to return groundwater to its beneficial uses. In the event that waste is closed in place (i.e., the burial grounds are not excavated), then it would be expected that groundwater outside of the "waste management zone" would not be contaminated above levels which would preclude its beneficial use. In regards to groundwater contained within the "waste management zone," EPA expects that actions would be taken to mitigate the continued input of contaminants into the shallow and deeper groundwater systems at the site. Additionally, this groundwater may require remedial measures to ensure that groundwater outside of the "waste management zone" and all surface waters are protected.

With respect to surface waters contained within Melton Valley, one potential approach to ensure protection of human health would be to preclude human access to waters of the state. As a general rule, this approach is less desirable to EPA, especially as a permanent solution in view of our statutory requirements and program expectations. Additionally, any final remedy selected must also ensure protection of the environment and ecological receptors. Therefore, even if an agreement was reached that would preclude recreational access to waters of the state for some period of time, the issue of ecological protection must be addressed by any selected remedial alternative.

3. EPA does not consider areas to the west of SWSA 6, east of SWSA 5, or waters of the state (e.g., White Oak Lake) to be disposal areas. Therefore, the future land use for these areas will not be the same as the disposal areas. Other land uses, such as industrial uses and buffer zones, should be considered as potential future uses for these portions of Melton Valley.

The Board states that “some of the restricted areas may be candidates for remediation.”

4. All contaminated areas at this NPL site are candidates for remediation. Every unit that presents unacceptable human health or environmental risk will be remediated.. In some cases that remediation may involve excavation of materials while in other cases containment and access controls may be utilized.

The Board states that “Levels of contaminants released into the Clinch River via White Oak Dam must not exceed standards protective of human health and the environment.

5. The EPA agrees that one of the goals for Melton Valley project will be to ensure protection of the Clinch River. Additionally, any remedy selected must ensure that White Oak Creek, Melton Branch, and all other waters of the State of Tennessee are protected. The two threshold criteria for remedy selection, overall protection and compliance with ARARs, require that cleanup goals be attained for all waters of the state, not just the Clinch River.

-- End of Comments --