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**RESPONSES TO OHIO EPA COMMENTS ON THE
OPERABLE UNIT 2 (OU 2) ACTIVE FLYASH PILE
CONTROLS REMOVAL ACTION WORK PLAN**

10-22-91

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ENCLOSURE**

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ACTIVE FLYASH PILE CONTROLS
REMOVAL ACTION WORK PLAN**

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- 1 ▶ COMMENT:** Ohio EPA Comment #1 -- Executive Summary, pg. vi, 2nd paragraph: Please provide a discussion in the text of ARARs which apply to this removal action.
- RESPONSE:** An attachment containing the ARARs and compliance strategy for this removal action will be added to the work plan.
- 2 ▶ COMMENT:** Ohio EPA Comment #2 -- Section 2.2, pg. 1, last paragraph: Please define unrestricted release values for radionuclides. What values allow unrestricted release?
- RESPONSE:** Section 2.2 will be modified to state: "The flyash from the Active Flyash Pile is assumed to be non-toxic and non-hazardous and to contain radionuclides below the 35 pCi/g level that is referenced in DOE proposed rule 10 CFR Part 834 (Draft 01/10/91) "Radiation Protection of the Public and the Environment," and in NRC Branch Technical Position (Federal Register, October 23, 1981) "Disposal or Onsite Storage of Thorium or Uranium Wastes from Past Operations."
- 3 ▶ COMMENT:** Ohio EPA Comment #3 -- Section 2.2, pg. 1, last paragraph: It is assumed by Ohio EPA that DOE will be able to determine in the RI report that the flyash is "non-toxic" and non-hazardous and contains radionuclides below unrestricted release values.
- RESPONSE:** The Operable Unit 2 (OU 2) Remedial Investigation (RI) Report will contain sufficient data to determine whether the flyash is "non-toxic" and non-hazardous per Ohio Policy Number 4.07. The report will also contain all radionuclide data obtained during the RI and previous studies.
- 4 ▶ COMMENT:** Ohio EPA Comment #4 -- Section 2.2, pg. 6, 2nd and 4th paragraphs: DOE should not reference the 1990 draft RI. This document is not available for public review and should not be referenced.

RESPONSE: This reference will be changed to the Initial Screening of Alternatives (ISA) Report, dated April 1991.

5 ▶ COMMENT: Ohio EPA Comment #5 -- Section 2.2, Table 2-3, pg. 9: Why is an average value given for Ra-226 when only 1 positive detection is reported? This is not the procedure followed for other single detections. Please correct the table.

RESPONSE: The average value for Ra-226 will be deleted from Table 2-3. Footnote b will be modified to provide clarification.

6 ▶ COMMENT: Ohio EPA Comment #6 -- Section 2.6.2, pg. 15, 5th bullet: DOE needs to work to minimize the application of water to the flyash pile within this removal action.

RESPONSE: Water will be added to the dust control agents in controlled quantities to facilitate easy application. Water alone will not be applied for dust control. Further details will be provided in the Standard Operating Procedure (SOP) prepared for Title Design.

7 ▶ COMMENT: Ohio EPA Comment #7 -- Section 2.6.3.1, pg. 16, 1st paragraph: Why is vegetation around the toe of the pile being removed? It would seem that the vegetation would help reduce erosion and runoff around the pile.

RESPONSE: The removal of vegetation is required in order to install the silt trap around the toe of the pile and to maintain it. The silt trap will reduce erosion and runoff from the pile. Vegetation within five feet from the toe of the pile will be removed in order to allow movement of operation and maintenance people and equipment. An effort will be made to remove or disturb as little vegetation as possible. Further details will be provided in the Title Design Drawings.

8 ▶ COMMENT: Ohio EPA Comment #8 -- Section 2.6.3.5, pg. 2-19 and Section 4.2, pg. 4-1: These passages address the sectioning of the flyash pile into active and inactive areas. The description of activities given is confusing. This is especially true in Section 4.2 where it is stated that "no additional ash will be deposited and no additional grading will be performed" in inactive areas. Yet the following sentence states that the inactive and active areas will

continually be changing. This indicates that there will be further deposition and grading of flyash in previously designated inactive areas. Please provide a detailed description of the plan to deposit and grade flyash that will clarify the statements made in the Work Plan.

RESPONSE:

The active portion of the pile will continue to receive flyash. This will be regraded and compacted until it reaches an elevation of 595.0 feet. After reaching this elevation, it will be inactivated and will not receive any more flyash. The wind barrier will be relocated to partition off the portion that has reached elevation 595.0 (Inactive) from the portion that has yet to reach elevation 595.0 (Active). This operation of depositing more flyash in the active area, regrading, compacting to elevation 595.0 and shifting the wind barrier will continue until the entire pile has reached the elevation 595.0 as indicated in sections AA and BB of Figure 2-9.

The wording of sections 2.6.3.5 and 4.2 will be modified to clarify this process. Further details will be provided in the detailed engineering drawings. The current design assumes that disposal of flyash will continue at the Active Flyash Pile for the time period leading up to remediation.

9 ► COMMENT:

Ohio EPA Comment #9 – Section 3.1, pg. 1, Table 3-1: The fact that this is designated a time-critical removal action requires that action be taken in less than 35 weeks. DOE must take a more timely action to meet the requirements of a time-critical removal action. It is not clear to Ohio EPA what part of this removal action would require 35 weeks to design. The time requirements of this work plan must be more clearly defined and justified.

RESPONSE:

Planning for design and implementation of this removal action started immediately after the action memorandum was issued on October 4, 1991. The work plan was completed and delivered to the U. S. EPA and Ohio EPA for review and comment by March 2, 1992, in accordance with the Consent Agreement with the U. S. EPA. Currently, the preliminary design for the removal action has been accomplished, including the design of interim control activities. The interim action plan includes a draft WEMCO Standard Operating Procedure addressing improved ash handling practices, and the grading and compaction plan. Implementation of the interim action will begin by June 30, 1992.

In addition to the activities associated with the removal action, maintenance actions were implemented during the summer of 1991 for the purpose of preventing the release of fugitive dust from the Active Flyash Pile. These measures include inspections of the pile and the application of water as needed to prevent dust emissions. Also, the tarp cover on the dump truck used to transport the ash was repaired to further prevent the release of fugitive dust. These measures will continue until the implementation of the removal action interim action begins.
