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COMMENTS ON THE FERNALD ENVIRONMENTAL MANAGEMENT PROJECT "SCRAP METAL PILES, REMOVAL ACTION NUMBER 15 WORK PLAN"

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COMMENTS

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General Comments:

Removal Action, Section 2.0--This work plan describes the proposed activities to implement the removal action for the Scrap Metal Piles (Removal Action #15) at the FEMP. The disposition of the recoverable scrap metals (ferrous, non-ferrous and copper) constitute this removal action. This removal action interested bidders submitted proposals based upon the Requests for Proposal (RFP), which states the tasks involved in the removal action, issued by the DOE.

This work plan does not clearly state the means by which the removal action is to be implemented. The work plan states that the subcontractors for both phases of activities are to generate, for DOE approval, task specific work plans prior to beginning work on the FEMP site. Since the subcontractor-generated task specific work plans will contain significant information on the processing of roughly 7000 tons of scrap metal, with much of this metal being radiologically contaminated, these task specific work plans should also be approved by the USEPA and the Ohio EPA. The Removal Action Number 15 Work Plan should clearly state this if it is to be approved by the USEPA.

DOE RESPONSE: The USDOE will revise the removal action work plan to incorporate USEPA's approval of the detailed RAPPs prior to the initiation of processing and disposition of both the recoverable scrap metal piles and scrap copper piles.

EPA RESPONSE: The comment is addressed in section 1.0, page 1, first paragraph stating, "This work plan provides a revised schedule allowing EPA's approval of a detailed Subcontractor's Removal Action Project Plan (RAPP) which will be submitted by the selected vendor prior to the initiation of field activities."

DOE RESPONSE: No further action required.

Specific Comments:

Page 4, Section 1.2, Para. 1 -- Uranium concentrations of the copper ingots should at very least be roughly stated to offer insight on the difficulty in their disposition.

DOE RESPONSE: USDOE will provide a rough estimate of the resulting range of uranium contamination levels within copper ingots made from the scrap copper pile in the Scrap Metal Piles Removal Action #15 Work Plan. Uranium concentrations within the copper ingots are estimated to be a maximum of 70 pCi/g.

EPA RESPONSE: The comment is addressed in the "RESPONSES TO REVIEW COMMENTS FOR SCRAP METAL PILES REMOVAL ACTION NO. 15 WORK PLAN REVIEW COMMENTS" document provided by USDOE but not in the work plan itself.

DOE RESPONSE: Page 4 of the Work Plan has been revised.

Page 4, section 1.2, definitions -- When defining "HIGH-COUNT" and "LOW COUNT," the full terms "HIGH-COUNT SCRAP METAL" AND "LOW-COUNT SCRAP METAL" should be used with the stated definitions. Unless the instrumentation to detect alpha contamination is calibrated to a specific radioisotope, "disintegrations per minute" when a variety of contaminates are involved. The term "probe area" should be replaced with "window area" to clearly indicate the active part of the alpha detector. Further, the units used to state the window area should be shown in parentheses just as "dpm" is indicated.

DOE RESPONSE: The text has been revised to reflect this comment.

EPA RESPONSE: The revisions were made throughout section 1.2 as necessary and DOE's basis for using "DPM" over "CPM" is explained. It must be well understood that the "200,000 dpm/window area" level is the criterion for segregating metals into "high count" and "low count" categories, not a level allowing release for unrestricted us.

DOE RESPONSE: Page 5 of the Work Plan has been revised.

Page 8, Section 2.0, Para. 3 -- Since the DOE cannot presume all aspects of the submitted proposals, but can only conceptualize the aspects, the review process by a Source Evaluation board should be detailed. It is important that the criteria for selecting the subcontractors is explained since the DOE is not clear as to what disposition methods are to be implemented, but only those methods which are to be emphasized.

DOE RESPONSE (in short): USDOE requests that USEPA approve this "programmatic" Removal Action work plan with the commitment that the specific project plans (RAPPs) will be provided to the USEPA for their review and approval for both phases I and II prior to the initiation of any field activities. USDOE has provided the Request for Proposal (RFP) document as an appendix to the revised removal action work plan as additional supporting documentation.

EPA RESPONSE: Accepted.

DOE RESPONSE: No further action required.