

4398

*OHIO EPA COMMENTS ON THE PLANT 7 REMOVAL
ACTION WORK PLAN*

05/17/93

OEPA/DOE-FN

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LETTER



State of Ohio Environmental Protection Agency

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LOG
FILE
LIST

G-03810

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MAY 19 10 05 AM '93

George V. Voinovich
Governor

May 17, 1993

Mr. Jack R. Craig
Project Manager
U.S. DOE FEMP
P. O. Box 398705
Cincinnati, Ohio 45239

Dear Mr. Craig:

Attached are comments resulting from Ohio EPA's review of the Plant 7 Removal Action. If you have any questions about these comments please contact Tom Schneider or me.

Sincerely,

Graham E. Mitchell
Project Manager

GEM/bjb

cc: Jenifer Kwasniewski, DERR
Tom Schneider, DERR
Jim Saric, USEPA
Dennis Carr, FERMC0
Lisa August, GeoTrans
Jean Michaels, PRC
Robert Owen, ODH

Shah
partial action response
to doe-1470-93
(6105)

The following are Ohio Environmental Protection Agency's comments on the FEMP's Plant 7 Removal Action #19 Work Plan.

1. Commenting Organization: Ohio EPA Commentor: Ohio EPA

Section #: 3 Pg #: 3-1 Line #: 26 Code: c

Original Comment #:

Comment: The use of direct in-place radiological measurements should be implemented until false readings are documented. The potential for false readings should be limited to the east side area adjacent to the 4B warehouse.

Response:

Action:

2. Commenting Organization: Ohio EPA Commentor: Ohio EPA

Section #: 3 Pg #: 3-3 Line #: 14 Code: c

Original Comment #:

Comment: What did the empty 5 gallon containers contain? Is there residual material left in the containers?

Response:

Action:

3. Commenting Organization: Ohio EPA Commentor:

Section #: 6 Pg #: 6-1 Line #: 7 Code: c

Original Comment #:

Comment: Rephrase the primary purpose of the removal action. Removal actions are not to provide training experience for workers and such. The primary purpose should be to abate conditions as established in 40 CFR 300.451(b)(2)(i)& 40 CFR 300.415(b)(2)(viii). If it so happens that a great opportunity to gain experience in the matter arises out of it, so much the better.

Action:

4. Commenting Organization: Ohio EPA Commentor: OEPA

Section #: 6 Pg #: 6-1 Line #: 23 Code: c

Original Comment #:

Comment: The description of phase one activities leaves the impression that the inventory material will be removed without decontaminating that equipment if necessary. This concern also arises in the detailed description of phase one activities on pg. 6-3. Any item removed from this building should go through some sort of decon procedures for both rad and asbestos contamination.

Response:

Action:

5. Commenting Organization: Ohio EPA Commentor:

Section #: 6 Pg #: 6-1 Line #: 37 Code: c

Original Comment #:

Comment: "Periodic radiation surveys" is very ambiguous. Since this removal action will serve as a way to gain

experience in "removing the potential for contaminant release from plant 7" it should also serve as a way for Health and Safety personnel to gain experience in determining effectiveness of their Health and Safety plan. Radiation surveys should occur quite frequently to insure procedures are effective.

Response:

Action:

6. Commenting Organization: Ohio EPA Commentor:

Section #: 6.2 Pg #: 6-2 Line #: 15 Code: c

Original Comment #:

Comment: The predetermined levels for asbestos fibers have not been stated. Is it the recommended NIOSH standard of 0.01 f/cc? Industrial Hygiene will monitor the air inside the workplace. Is the workplace inside or outside of the containment area? Will ambient air monitoring be conducted outside the work zone? Ambient background levels for asbestos should be collected prior to the start up of any activities to provide levels for comparison. What fiber level will be needed before tear down of the containment occurs? Will a visual inspection of the asbestos containment area be performed prior to final air sampling when a containment is established?

Response:

Action:

7. Commenting Organization: Ohio EPA Commentor:

Section #: 6.3 Pg #: 6-3 Line #: 21-30 Code: c

Original Comment #:

Comment: Expand in further detail where this material will be moved to, stored or disposed.

Response:

Action:

8. Commenting Organization: Ohio EPA Commentor:

Section #: 6.3 Pg #: 6-3 Line #: 40 Code: c

Original Comment #:

Comment: Define significant.

Response:

Action:

9. Commenting Organization: Ohio EPA Commentor:

Section #: 6.3 Pg #: 6-4 Line #: 7 Code: c

Original Comment #:

Comment: HEPA filtration will not prevent the egress of radionuclides if, at a minimum, critical barriers are not in place and a negative atmosphere established and maintained. Is this filtration system to serve as a barrier for asbestos fibers also?

Response:

Action:

10. Commenting Organization: Ohio EPA Commentor:

Section #: 6.3 Pg #: 6-4 Line #: 24 Code: c

Original Comment #:

Comment: The use of latex paint is an expensive alternative for sealing the friable asbestos material. There are products specifically designed to encapsulate asbestos material that are more effective, less expensive and easier to apply.

Response:

Action:

11. Commenting Organization: Ohio EPA Commentor:

Section #: 6.5.3 Pg #: 6-9 Line #: Table 6-2, bullet 3 Code: c

Original Comment #:

Comment: Provide the referenced Table 2-2. Use the word provided not proved.

Response:

Action:

12. Commenting Organization: Ohio EPA Commentor:

Section #: 6.5.5 Pg #: 6-11 Line #: 15 Code: c

Original Comment #:

Comment: The urgency referenced in this statement is understood but not really defined by the document.. The point of gaining the experience in eliminating the potential for contamination has been stressed more.

Response:

Action:

13. Commenting Organization: Ohio EPA Commentor:

Section #: 7.3 Pg #: 7-2 Line #: 8 Code: c

Original Comment #:

Comment: HEPA filters have an efficiency rate of 99.99%. It is not capable of removing "any" airborne asbestos fiber present as stated.

Response:

Action:

14. Commenting Organization: Ohio EPA Commentor:

Section #: 7.5 Pg #: 7-2 Line #: 38 Code: c

Original Comment #:

Comment: Revisions to NESHAP sets up categories for ACM. Floor tile is now a category one material and the Regs allow for it to remain in place when a building is being razed provided the material is in good shape and will not become friable during the demolition. This needs to be evaluated further. If the floor tile does not need to be removed the costs associated with such actions will be, dramatically, reduced.

Response:

Action:

15. Commenting Organization: Ohio EPA Commentor:

Section #: 7.5 Pg #: 7.3 Line #: 2-12 Code: c

Original Comment #:

Comment: The removal of the transite panels may be effectively done using a point source vacuum system. If

the fasteners can be removed under this type of system then better emission controls will be achieved. These techniques will be very applicable to the exterior panels were limited to no containment or filtration will be able to be employed. Point source vacuum system can be easily developed using a HEPA equipped vacuum with a device attached onto the end of the hose such as a PVC Tee fitting. This device can be held against the transite, covering the fastener, while a vacuum is being pulled from the side of the tee. Any asbestos fiber or lead dust disturbance will be effectively captured. Use of a point source filtration system will eliminate the need for costly containments, however; the use of critical barriers should be employed were applicable.

The application techniques of a sealant (encapsulating agent) have not been discussed. How does DOE intend on applying these materials?

Response:

Action:

16. Commenting Organization: Ohio EPA Commentor:

Section #: 9.2 Pg #: 9-2 Line #: 7 Code: c

Original Comment #:

Comment: Determining that listed wastes do not exist is fine, however , DOE will need to determine if the waste streams exhibit characteristics that will make it a hazardous waste. One can not assume this material will not exhibit characteristic properties (e.g. TCLP, corrosive). In addition , previous submittals from DOE indicate that the lead coverings may be mixed wastes.

Response:

Action:

17. Commenting Organization: Ohio EPA Commentor:

Section #: Table 9-1 Pg #: 9-3 Line #: 10-14 Code: c

Original Comment #:

Comment: The number of grab samplers should be increased to close some of the potential gaps in the sampling areas. Since this will be a new type of project the over-sampling would ensure that all engineering controls are working. This data can then be applied to future projects with certainty of design effectiveness.

Response:

Action: