

4907

**DISAPPROVAL OF THE OU 4 FEASIBILITY
STUDY REPORT AND PROPOSED PLAN**

11/09/93

**OEPA/DOE-FN
18
COMMENTS
OU4**



State of Ohio Environmental Protection Agency

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H-07168
AR 4907

George V. Voinovich
Governor

November 9, 1993

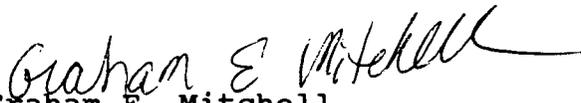
Mr. Jack R. Craig
Project Manager
U.S. DOE FEMP
P. O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Craig:

Attached are Ohio EPA comments on the O.U. 4 Feasibility Study and Proposed Plan. We are still discussing the status of Solid Waste Siting Criteria as ARARs, so the State reserves the right to give additional comments when this issue is resolved.

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, U.S. EPA
Ken Alkema, FERMCO
Lisa August, GeoTrans
Jean Michaels, PRC
Robert Owen, ODH

OHIO EPA COMMENTS
ON
OU4 FEASIBILITY STUDY AND PROPOSED PLAN

Feasibility Study Comments

- 1) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: Figure 1-10 Pg #: 1-31 Line #: Code: e
Original Comment #:
Comment: Wetland WQ is not delineated on the map in black. The wetland is located in the northwest corner of the FEMP.

Response:
Action:

- 2) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 1.4.1.1 Pg #: 1-32 Line #: 6-12 Code: c
Original Comment #:
Comment: A sentence stating that, additional investigations to determine the presence/absence of the Indiana bat on the FEMP will be conducted, should be added to the text.

Response:
Action:

- 3) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 1.5.2 Pg #: 1-60 Line #: 8-19 Code: c
Original Comment #:
Comment: The text should state that a sample collected from the berm soils failed TCLP for several inorganic contaminants.

Response:
Action:

- 4) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 1.6.2 Pg #: 1-67 Line #: 7-8 Code: c
Original Comment #:
Comment: The statement that surface water exposure is unlikely to be a significant source of risk to terrestrial ecological receptors should be deleted. The previous text states that HIs exceeding one were documented for three inorganic contaminants, thus supporting the potential for risk to terrestrial receptors.

Response:
Action:

- 5) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 2.2 Pg #: 2-4 Line #: 8-9 Code: c
Original Comment #:
Comment: DOE should discuss the point at which it intends to prove that Silo 4 construction materials are not contaminated. Since DOE failed to characterize the silo 4 material, the potential for it to be contaminated should be considered within the contingencies for the

final remediation and the material must be characterized prior to its disposal.

Response:
Action:

- 6) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: Table 2-4 Pg #: 2-11 Line #: Code: c
Original Comment #:
Comment: DOE should provide, within the FS, the NRC and DOE criteria for the free-release of contaminated material. Simply stating that these criteria will be used does not provide sufficient detail.

Response:
Action:

- 7) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: Table 2-5 Pg #: 2-18 Line #: Code: c
Original Comment #:
Comment: DOE failed to consider the NRC Branch Technical Position paper as a TBC for uranium and thorium cleanup levels.

Response:
Action:

- 8) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: Table 2-5 Pg #: 2-20 Line #: Code: e
Original Comment #:
Comment: There are no references to footnotes "f", "j", or "k" within Table 2-5. The table or footnotes should be revised.

Response:
Action:

- 9) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: Table 2-6 Pg #: 2-27 Line #: Code: e
Original Comment #:
Comment: DOE should maintain consistent notation throughout the table. The scientific notation under the risk based PRGs should be replaced with decimals to match the rest of the table.

Response:
Action:

- 10) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 2.2.2.4 Pg #: 2-31 Line #: 1-11 Code: c
Original Comment #:
Comment: This section of text initially discusses groundwater pathways and then discusses a soil PRG of 0.5 pCi/l. It would seem

the section needs some revision or clarification.

Response:
Action:

- 11) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 2.2.3.2 Pg #: 2-38 Line #: 18-19 Code: c
Original Comment #:
Comment: The document should define the free release limits provided in DOE Order 5400.5. Additionally, DOE has failed to define the ILCR associated with these limits.

Response:
Action:

- 12) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 2.6.4.1 Pg #: 2-85 Line #: 23-25 Code: c
Original Comment #:
Comment: DOE should retain the option of pumping wells for remedial action. The fact that the decant sump tank lies within the perched groundwater would suggest the need for pumping wells to draw down the water table prior to tank and associated soil removal.

Response:
Action:

- 13) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: Figure 3-17 Pg #: 3-63 Line #: Code: c
Original Comment #:
Comment: What justification did DOE use for the elimination of vacuum grit blasting for the decontamination of construction debris? It seems this technology would be useful for decontaminating both steel and concrete, while not generating large volumes of contaminated water.

Response:
Action:

- 14) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 3.2.6.4 Pg #: 3-74 Line #: 26-27 Code: c
Original Comment #:
Comment: The section discusses spatial requirements for vitrification and cementation, yet it is supposed to be dealing with Subunit C material. The text should be reviewed and clarified.

Response:
Action:

- 15) Commenting Organization: Ohio EPA Commentor: T. Schneider

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Section #: 3.3.2.2 Pg #: 3-100 Line #: 14-15 Code: c
Original Comment #:

Comment: The statement that vitrification will achieve a reduction in toxicity for the Subunit B waste via organic destruction should be deleted. DOE has maintained that no organic contamination exists within the Silo 3 contents due to process knowledge, etc.. If no organics are present, a reduction in toxicity is not possible.

Response:
Action:

- 16) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 3.3.3.4 Pg #: 3-114 Line #: 11-14 Code: c
Original Comment #:
Comment: At this point in the document, it becomes apparent to the reader that it is cheaper to dispose of A & B waste at NTS vs. on-site, yet it is cheaper to dispose of C wastes on-site vs. at NTS. DOE should clearly state within this summary section the reason for this difference in disposal costs.

Response:
Action:

- 17) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 3.3.3.5 Pg #: 3-115 Line #: 1-7 Code: c
Original Comment #:
Comment: Since this alternative does not require both truck and rail shipment, it would seem the short-term risks would be lower than Alternative 3C.1. Alternative 3C.1 requires that the waste be unloaded from the train and then transported via truck additional miles. Both of these activities would seem to increase the short-term risk via exposure and accident probability over alternative 3C.2.

Response:
Action:

- 18) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 4.1.2.2 Pg #: 4-6 Line #: 18 Code: c
Original Comment #:
Comment: DOE should include the NRC Branch Technical Position Paper which provides uranium and thorium cleanup criteria as a chemical specific TBC.

Response:
Action:

- 19) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 4.1.2.2 Pg #: 4-6 Line #: 28 Code: c

Original Comment #:

Comment: DOE should include these location specific ARARS a) Ohio Endangered Species Act ORC 1518, OAC 1501:18-1-01, ORC 1513.25.
 b) 40 CFR 6.302(a) (Executive Order 11990).
 c) All of 3745-27-07(B).
 d) DOE should review the document "Potential ARARs: Engineered Waste Management Facility" (6/92) for additional ARARs.

Response:
 Action:

- 20) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: Figure 4-4 Pg #: 4-20 Line #: Code: e
 Original Comment #:
 Comment: The majority of the text on Figure 4-4 is unreadable. The figure should be revised.

Response:
 Action:

- 21) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: Figure 4-5 Pg #: 4-21 Line #: Code: e
 Original Comment #:
 Comment: The majority of the text on Figure 4-5 is unreadable. The figure should be revised.

Response:
 Action:

- 22) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.2.2.2 Pg #: 4-30 Line #: 15-21 Code: c
 Original Comment #:
 Comment: DOE contradicts itself within the first and third bullets of this section. The first bullet states that zones of saturation in the glacial overburden "...are not viable sources of groundwater for domestic...", yet the third bullet states the overburden is used for water supplies, though infrequently. The fact that the glacial overburden yields useable quantities of water is further supported by DOE's use of residential wells, located within the overburden, as background groundwater sampling locations.

Response:
 Action:

- 23) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.2.2.2 Pg #: 4-30 Line #: 26-27 Code: c
 Original Comment #:
 Comment: DOE's statement that, "there are no known groundwater supply wells completed in the till downgradient of the FEMP" must be

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qualified with the statement that, there is minimal or no till downgradient of the FEMP.

Response:
 Action:

- 24) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.2.2.2 Pg #: 4-32 Line #: 23-24 Code: c
 Original Comment #:
 Comment: When was the determination made that the proposed location of the disposal vault does not jeopardize endangered or threatened species or their habitat? It was Ohio EPA's understanding that DOE was continuing to evaluate the potential presence of the Indiana bat and it's habitat on the FEMP. Additionally, this section fails to consider Ohio's Endangered Species Act and the potential impact to state endangered species.

Response:
 Action:

- 25) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.2.2.2 Pg #: 4-32 Line #: 28-31 Code: c
 Original Comment #:
 Comment: DOE should provide a citation/reference for the Area of Contamination definition and requirements which support the proposed definition.

Response:
 Action:

- 26) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.2.2.2 Pg #: 4-33 Line #: Code: c
 Original Comment #:
 Comment: This section should be revised to include a discussion of all criteria provided in OAC 3745-27-07 B(1-15) and how the proposed disposal facility will meet or not meet them.

Response:
 Action:

- 27) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.2.2.5 Pg #: 4-51 Line #: 14-15 Code: c
 Original Comment #:
 Comment: The elimination of forested wetlands due to the installation of the disposal facility is a permanent loss of habitat. The sentence should be deleted.

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Response:
Action:

- 28) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 4.2.2.5 Pg #: 4-61 Line #: 18-20 Code: c
Original Comment #:
Comment: Was the design of these roads based upon the expected truck traffic of 600 one-way trips per day for the duration of this alternative? It would seem a more substantial road may be necessary.

Response:
Action:

- 29) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 4.2.2.5 Pg #: 4-63 Line #: 16-20 Code: c
Original Comment #:
Comment: Do the calculations of #'s of package take into account weight requirements per package? In other words, did DOE assume the package could be completely filled or was a per package weight limit also considered? Previously, Ohio EPA has been told that waste packages of soil couldn't be completely filled because of weight requirements thus necessitating additional packaging. DOE should discuss the potential for such requirements for both on-property and off-property disposal options.

Response:
Action:

- 30) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: Figure 4-11 Pg #: 4-65 Line #: Code: e
Original Comment #:
Comment: The majority of the text on this figure is unreadable.

Response:
Action:

- 31) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 4.2.4.5 Pg #: 4-82 Line #: 11-12 Code: c
Original Comment #:
Comment: The document should discuss the decrease in the number of truck trips in the off-property vs. on-property disposal option. The text should briefly discuss the objective of the truck traffic under each option. Additionally, the cost tables do not reflect any difference in these costs between off-property and on-property options. DOE should provide a justification for the differences truck traffic and no subsequent difference in cost.

Response:
Action:

- 32) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 4.2.4.7 Pg #: 4-84 Line #: 24-28 Code: c
Original Comment #:
Comment: It would seem that the amount of roads and such would be different between the on-property vs. off-property disposal options. This is based on less distance to move the waste and upon the lower number of truck trips required for each option. Such a difference is not evident in the document, what is DOE's justification for this?

Response:
Action:

- 33) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 4.2.4.7 Pg #: 4-86 Line #: 10-13 Code: c
Original Comment #:
Comment: As stated previously it is unclear whether DOE should assume the packages can be completely filled. DOE should discuss within the FS the criteria for waste acceptance used by NTS. Additionally, DOE should discuss any deviations from that criteria which were acceptable for on-property disposal.

Response:
Action:

- 34) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 4.3.2 Pg #: 8-10 Line #: 8-10 Code: c
Original Comment #:
Comment: It is unclear whether this alternative is proposing to use the same vitrification unit as will be used for the Subunit A waste. Additionally, is DOE considering blending the wastes prior to vitrification if the same unit is being used? This is still unclear upon reading the proposed plan. DOE should clarify this especially within the proposed plan.

Response:
Action:

- 35) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 4.3.3.5 Pg #: 4-130 Line #: 9-10 Code: c
Original Comment #:
Comment: It seems a bit unreasonable to expect a truck to depart every 42 seconds to make the one-way trip (117 trucks, 18 trips/truck). DOE should discuss the reasoning behind this proposal and its impact on cost.

Response:

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Action:

- 36) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.4 Pg #: Line #: Code: c
 Original Comment #:
 Comment: This section never addresses the fact that the subunit C wastes could be a hazardous waste by characteristic. This is likely based upon the fact that the silo wastes fail characteristic tests and the berm soils failed TCLP for one sample. The document should discuss this and it must be addressed during the design of the decontamination pad, etc..

Response:
 Action:

- 37) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.4 Pg #: Line #: Code: c
 Original Comment #:
 Comment: The section discusses the fact that some Subunit C waste could be dispositioned with the Subunit A & B wastes, yet no criteria for making this differentiation are discussed. DOE should include within the document a discussion of criteria for placing C waste within the selected alternative for A & B wastes.

Response:
 Action:

- 38) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.4.2 Pg #: 4-157 Line #: 16-23 Code: c
 Original Comment #:
 Comment: DOE must provide a more in depth justification that ensures the Federal government will maintain perpetual ownership of the property. The justification is necessary to convince Ohio EPA that the recreational exposure is the only future exposure scenario. DOE should discuss the extent of property it intends to maintain ownership of at the FEMP. The section should also provide a more in depth discussion of the planned future land use which allows for only a recreational exposure.

Response:
 Action:

- 39) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.4.2 Pg #: 4-157 Line #: 24-28 Code: c
 Original Comment #:
 Comment: The attainment of cleanup to soil action levels must be determined in accordance with the USEPA guidance document, "Methods for Evaluating the Attainment of Cleanup Standards. Volume 1. Soils and Solid Media." (1989)

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Response:
Action:

- 40) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: Table 4-10 Pg #: 4-158 Line #: Code: c
Original Comment #:
Comment: a) Since the proposed remediation levels provided in the table do not agree with the protocol discussed on page 4-160 (e.g., Pb-210, etc.), DOE should specify within the table the criteria used for each proposed remediation level.
b) The table should include TBC cleanup criteria for both uranium and thorium.
c) DOE must include all COCs for surface and berm fill soil defined within the OU4 RI (Table D.2-5 thru D.2-7) in this table.

Response:
Action:

- 41) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: Table 4-11 Pg #: 4-159 Line #: Code: c
Original Comment #:
Comment: a) Since the proposed remediation levels provided in the table do not agree with the protocol discussed on page 4-160 (e.g., Antimony, etc.), DOE should specify within the table the criteria used for each proposed remediation level.
b) DOE must include all COCs for surface and berm fill soil defined within the OU4 RI (Table D.2-5 thru D.2-7) in this table.
c) The table should include an HI for uranium.
d) The reason for the NAs under the HI column must be justified.

Response:
Action:

- 42) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 4.4.2 Pg #: 4-160 Line #: 19-22 Code: c
Original Comment #:
Comment: Simply placing six inches of clean fill upon the residual soils is not acceptable protection. DOE is proposing to leave soils contaminated at above background concentrations, which pose a risk greater than 1×10^{-6} and even greater than 1×10^{-4} for the on-property farmer. These soils constitute a solid waste and must undergo closure consistent with solid waste ARARs (OAC 3745-27-11, 3745-27-14 Applicable). If DOE intends to leave residual soils at the proposed levels, a solid waste cap will be required for the residual area.

Response:
Action:

- 43) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.4.2 Pg #: 4-161 Line #: 10-13 Code: c
 Original Comment #:
 Comment: If the same process options were evaluated, why is the cost for on-property disposal of A & B wastes higher than off-property disposal, while on-property disposal of C wastes is cheaper than off-property disposal? DOE should clearly define within this section those requirements it is proposing to use for the disposal vault for subunit C material and how exactly it differs from the subunit A & B disposal vault. Additionally, the justification for these differences should be provided.

Response:
 Action:

- 44) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.4.2.1 Pg #: 4-164 Line #: 15-27 Code: c
 Original Comment #:
 Comment: As stated previously, DOE must provide additional detail and justification for the proposed future land use and Federal ownership. Based upon DOE's proposed cleanup levels, the only acceptable land use is recreational. DOE must discuss how it intends to implement this land use.

Response:
 Action:

- 45) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.4.2.2 Pg #: 4-165 Line #: 1-10 Code: c
 Original Comment #:
 Comment: As stated previously, the residual soil DOE proposes to leave in place are a solid waste and must undergo closure. The proposed six inches of clean fill is not an acceptable closure. The alternative as proposed does not comply with OAC 3745-27-11.

Response:
 Action:

- 46) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.4.2.3 Pg #: 4-169 Line #: 11-16 Code: c
 Original Comment #:
 Comment: It is unclear how the disposal facility for subunit C waste, which is substantially larger than those for A & B waste, will only disturb 0.2 ha of forested wetlands with respect to the large disturbance of wetlands required for A & B disposal. This lack of clarity is partially based upon the fact that no figure within the document provides the locations of the three disposal units and their respective impacts on wetlands.

Response:
Action:

- 47) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.4.2.4 Pg #: 4-170 Line #: 3-8 Code: c
 Original Comment #:
 Comment: The text should state that this alternative will not meet the statutory preference for treatment defined in the NCP. Additionally, it is equally conceivable (lines 7-8) that the concrete and structural materials could be a characteristic hazardous waste based upon the fact that residues had such characteristics. This possibility is not addressed within the alternative.

Response:
Action:

- 48) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.4.2.5 Pg #: 4-173 Line #: 1-4 Code: c
 Original Comment #:
 Comment: DOE should include a brief discussion of the purpose of these trucks and the justification for the number of trips and trucks.

Response:
Action:

- 49) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.4.2.7 Pg #: 4-177 Line #: 4-19 Code: c
 Original Comment #:
 Comment: DOE stated on page 4-161, "...the identical representative process options employed for Subunit A & B waste have been used to evaluate the on-property disposal alternatives for Subunit C waste." The unit cost for the disposal vault for Subunit C waste is substantially less than that of Subunit A waste suggesting identical process options were not used. DOE must discuss the differences between proposed disposal vaults and provide justifications for the differences.

Response:
Action:

- 50) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 4.4.3.2 Pg #: 4-180 Line #: 9-18 Code: c
 Original Comment #:
 Comment: See previous comment on section 4.4.2.2.

Response:
Action:

- 51) Commenting Organization: Ohio EPA Commentor: T. Schneider

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Section #: 4.4.4 Pg #: 4-186 Line #: 19-21 Code: c
Original Comment #:

Comment: DOE is proposing to use the same shipping containers for disposal at NTS and the commercial facility. It is Ohio EPA's understanding that one advantage to the commercial facility is the difference in disposal container requirements or the ability to reuse containers. The document fails to address differences in waste acceptance criteria for NTS and the commercial facility and the resultant impact on costs. The document should be revised to include a discussion on waste acceptance criteria for all three disposal facilities and the resultant impacts on cost.

Response:
Action:

- 52) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 4.4.2.4 Pg #: 4-190 Line #: 25-29 Code: c
Original Comment #:
Comment: See previous comment on section 4.4.3.4. Additionally, correct "martials" pg. 4-191, line 1 to read "materials".

Response:
Action:

- 53) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: 4.4.4.7 Pg #: 4-194 Line #: 3 Code: c
Original Comment #:
Comment: DOE should provide a discussion of the basis for this unit disposal cost and that required for NTS.

Response:
Action:

- 54) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: Table 5-4 Pg #: 5-7 Line #: Code: e
Original Comment #:
Comment: Alternative 3B Transport Impacts should probably be revised to " 9×10^{-12} ".

Response:
Action:

- 55) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: Table 5-5 Pg #: 5-9 Line #: Code: c
Original Comment #:
Comment: a) Table 4-10 contradicts the B.S.L designation for subunit C alternatives for the future on-property farmer. Table 4-10 suggests the radiological ILCR would be $>1 \times 10^{-3}$ for the future on-property farmer. Additionally, footnote "f" is not appropriate for

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alternatives 3C.1 and 3C.2, since residual contamination is left in place constituting a radiological ILCR $>1 \times 10^{-3}$ (Table 4-10).
b) Footnotes "b", "g", "h", and "i" are not included within the table. Delete the footnotes or include them in the table.

Response:
Action:

- 56) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 5.2.1.2 Pg #: 5-13 Line #: 21-29 Code: c
 Original Comment #:
 Comment: This section discusses protection of the uppermost aquifer from waste within the vault, but no section discusses protection of the aquifer from residual soils following cleanup. The document should discuss the potential impacts to the aquifer from the proposed residual soil concentrations.

Response:
Action:

- 57) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 5.4.1.2 Pg #: 5-39 Line #: 10-18 Code: c
 Original Comment #:
 Comment: As stated previously, the subunit C alternatives will not comply with Applicable solid waste closure requirements (OAC 3745-27-11). The section should also discuss the failure to meet TBC cleanup levels for uranium and thorium.

Response:
Action:

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PROPOSED PLAN COMMENTS

- 1) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: General Comment Pg #: Line #: Code: c
 Original Comment #:
 Comment: All changes to the FS based upon Ohio EPA comments should also be reflected in the revised Proposed Plan as appropriate.

 Response:
 Action:
- 2) Commenting Organization: Ohio EPA Commentor: G. Mitchell
 Section #: 1.0 Pg #: 2 Line #: 18 Code: e
 Original Comment #:
 Comment: Delete "90".

 Response:
 Action:
- 3) Commenting Organization: Ohio EPA Commentor: G. Mitchell
 Section #: 4.2 Pg #: 20 Line #: 19 Code: e
 Original Comment #:
 Comment: Revise "form" to "from."

 Response:
 Action:
- 4) Commenting Organization: Ohio EPA Commentor: G. Mitchell
 Section #: 4.5 Pg #: 41 Line #: 1-2 Code: c
 Original Comment #:
 Comment: The fact that the predicted potential effects have not occurred should be reserved for the OU5 RI Ecological Assessment when the data can be viewed to verify this conclusion.

 Response:
 Action:
- 5) Commenting Organization: Ohio EPA Commentor: T. Schneider
 Section #: 5.4.1 Pg #: 59 Line #: 21-30 Code: c
 Original Comment #:
 Comment: Attainment of any cleanup levels must be determined in accordance with USEPA guidance "Methods for Evaluating the Attainment of Cleanup Standards. Volume i. Soils and Solid Media." (1989).

 Response:
 Action:
- 6) Commenting Organization: Ohio EPA Commentor: T. Schneider

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Section #: 5.4.1 Pg #: 59 Line #: 31-34 Code: c

Original Comment #:

Comment: DOE fails to provide any criteria for making the determination whether Subunit C wastes will be dispositioned with Subunit A wastes. DOE should provide such criteria within the FS at a minimum.

Response:

Action:

7) Commenting Organization: Ohio EPA Commentor: T. Schneider

Section #: 5.4.1 Pg #: 61 Line #: 14-17 Code: c

Original Comment #:

Comment: What basis does DOE have for stating that the soil cleanup levels with the clean fill are protective of a hypothetical future on-property farmer? Table 4-10 in the FS suggests the radiological ILCR alone to this individual would be in greater than 1×10^{-3} . Thus, the proposed remedy is not protective of a future on-property farmer.

Response:

Action:

8) Commenting Organization: Ohio EPA Commentor: G. Mitchell

Section #: 6.1 Pg #: 66 Line #: 26 Code: e

Original Comment #:

Comment: Delete "in."

Response:

Action:

9) Commenting Organization: Ohio EPA Commentor: G. Mitchell

Section #: 6.2.1.2 Pg #: 77 Line #: 1-2 & 13-14 Code: c

Original Comment #:

Comment: It may be more descriptive to add that engineering controls would be used to address this "uncertainty."

Response:

Action:

10) Commenting Organization: Ohio EPA Commentor: T. Schneider

Section #: 6.2.3.1 Pg #: 85 Line #: 12-31 Code: c

Original Comment #:

Comment: The proposed 3C alternatives will not comply with solid waste closure requirements (OAC 3745-27-11) for the residual soils.

Response:

Action:

OEPA COMMENTS OU4 FS/PP
November 9, 1993
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11) Commenting Organization: Ohio EPA Commentor: G. Mitchell
Section #: 6.3.2 Pg #: 94 Line #: 2 Code: e
Original Comment #:
Comment: Revise "consist" to state "consistent."

Response:
Action:

12) Commenting Organization: Ohio EPA Commentor: T. Schneider
Section #: Figure 6-3 Pg #: 95 Line #: Code: c
Original Comment #:
Comment: The location of the OU4 disposal facility as shown in this drawing appears to conflict with the proposed location of the OU3 storage facility as defined in the OU3 Proposed Plan. The OU3 CSF as drawn in Figure 6-3 does not reflect that presented in the OU3 PP. DOE must provide additional drawings within the OU4 FS of the proposed location for the OU4 disposal facilities and the proposed OU3 storage facility as defined in the OU3 PP to ensure that the two OU's (4&3) are not planning to use the same area. Figure 6-3 should then be revised as appropriate.

Response:
Action: