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**OHIO EPA COMMENTS ON THE REVISED O.U. 4
FS/PP**

01/24/94

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



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George V. Voinovich
Governor

January 24, 1994

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 revised O.U. 4 FS/PP document. Ohio EPA believes that there are still significant issues with this document that need to be resolved. Please contact Tom Schneider or me if you have any questions.

Sincerely,

Graham E. Mitchell
Project Manager

GEM/bjb

cc: Tom Schneider, DERR
Jenifer Kwasniewski, DERR
Jim Saric, U.S. EPA
Ken Alkema, FERMCO
Lisa August, GeoTrans
Jean Michaels, PRC
Robert Owen, ODH

OEPA COMMENTS
ON
OU4 FS/PP REV.1

Feasibility Study Comments

1. Commenting Organization: Ohio EPA Commentor: DERR
Section #: Figure 1-10 Pg #: 1-31 Line #: Code: e
Original Comment #:
Comment: As stated in OEPA's 11/9/93 Comment #1, Wetland WQ is not delineated on the map in black. The wetland is located in the northwest corner of the FEMP. The figure was not revised as suggested in DOE's response to comments.

Response:
Action:

2. Commenting Organization: Ohio EPA Commentor: DERR
Section #: Table 2-4 Pg #: 2-11 Line #: Code: c
Original Comment #:
Comment: As stated in OEPA's 11/9/93 Comment #6, 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. Just as soil cleanup numbers are provided in the FS, so should the free-release criteria for structural material and equipment.

Response:
Action:

3. Commenting Organization: Ohio EPA Commentor: DERR
Section #: Table 2-5 Pg #: 2-20 & -22 Line #: Code: c
Original Comment #:
Comment: As stated in OEPA's 11/9/93 Comment #7, DOE failed to consider the NRC Branch Technical Position paper as a TBC for uranium and thorium cleanup levels. DOE's response suggest the NRC paper is outdated but provides no supporting documentation for excluding the document as a TBC. DOE should provide a reference to USEPA guidance which supports not including the position paper as a TBC. The position paper numbers should be included in Table 2-5.

Response:
Action:

4. Commenting Organization: Ohio EPA Commentor: DERR
Section #: 2.2.4.2 Pg #: 2-45 Line #: 7-17 Code: c
Original Comment #:
Comment: As stated in OEPA's 11/9/93 Comment #11, the document should define the free release limits provided in DOE Order 5400.5. Just as soil cleanup numbers are presented in the FS, numbers for structural material and equipment should be provided.

Response:

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Action:

5. Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 3.3.3.4 Pg #: 3-129 Line #: Code: c
 Original Comment #:

Comment: In DOE's response to OEPA's 11/9/93 Comment #16, DOE states that "all of these changes result in an off-site disposal cost that is lower than the on-property alternative." Yet when the costs presented in the FS are compared Alt. 2C is still cheaper than Alts. 3C.1 and 3C.2. DOE must clarify this discrepancy.

Response:

Action:

6) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 3.2.2.1 Pg #: 3-4 Line #: 1-9 Code: c
 Original Comment #:

Comment: It is unclear what the basis is for the drainage layer proposed over the cobblestone layer. It would seem more likely that infiltrating water would migrate vertically through the cobblestone than horizontally along the drainage layer of pea gravel.

Response:

Action:

7. Commenting Organization: Ohio EPA Commentor: DDAGW
 Section #: 3.2.2.1 Pg #: 3-6 Line #: Figure 3-3 Code:
 Original Comment #:

Comment: It is inappropriate to indicate a location for the proposed vault at this time. There is insufficient data to support any specific location at FEMP.

Response:

Action:

8) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 3.2.2.1 Pg #: 3-7 Line #: 23-29 Code: c
 Original Comment #:

Comment: As stated in OEPA's comments on the previous draft, the proposed disposal facility appears to conflict with the proposed location of the OU3 storage facility as defined in the approved OU3 Proposed Plan. It would appear DOE has failed to consider potential future uses in its evaluation of the location. Based upon this and other data regarding the ability of the location to meet Ohio solid waste disposal facility siting requirements, DOE should delete the proposed location from the FS.

Response:

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Action:

- 9) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: Figure 3-4 Pg #: 3-9 Line #: Code: c
 Original Comment #:
 Comment: The cross section provided is not A-A' as defined in Figure 3-3. If DOE decides to leave the proposed location and data in the FS, the figure must be revised to agree with Figure 3-3.

Response:
Action:

- 10) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: Figure 3-5 Pg #: 3-10 Line #: Code: c
 Original Comment #:
 Comment: The cross section provided is not B-B' as defined in Figure 3-3. If DOE decides to leave the proposed location and data in the FS, the figure must be revised to agree with Figure 3-3.

Response:
Action:

- 11) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: Figure 3-6 Pg #: 3-11 Line #: Code: c
 Original Comment #:
 Comment: The cross section provided is not C-C' as defined in Figure 3-3. If DOE decides to leave the proposed location and data in the FS, the figure must be revised to agree with Figure 3-3.

Response:
Action:

- 12) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: Figure 3-7 Pg #: 3-12 Line #: Code: c
 Original Comment #:
 Comment: The cross section provided is not D-D' as defined in Figure 3-3. If DOE decides to leave the proposed location and data in the FS, the figure must be revised to agree with Figure 3-3.

Response:
Action:

Commenting Organization: Ohio EPA Commentor: DDAGW
 Section #: 3.2.2.1 Pg #: 3-14 Line #: 1 Code:
 Original Comment #:
 Comment: There are domestic users of till wells in the FEMP area. Till does not transmit ground water as readily as sand and gravel, but it does transmit significant quantities of ground water.

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Response:
Action:

- 13) Commenting Organization: Ohio EPA Commentor: DDAGW
Section #: 3.2.2.1 Pg #: 3-14 Line #: 14-19 Code:
Original Comment #:
Comment: Ohio EPA was informed by DOE in the 01/19/94 vault siting meeting that the till is saturated. Therefore, infiltration is not limited to the brown till.

Response:
Action:

- 14) Commenting Organization: Ohio EPA Commentor: DDAGW
Section #: 3.2.2.1 Pg #: 3-14 Line #: para 4 Code:
Original Comment #:
Comment: This paragraph should be revised to accurately reflect information presented in the 01/19/94 meeting.

Response:
Action:

15. Commenting Organization: Ohio EPA Commentor: DERR
Section #: Table 3-1 Pg #: 3-15 Line #: Code: c
Original Comment #:
Comment: The table references an OU3 RI (DOE 1990). This document has not been submitted to the EPAs and is not readily accessible. DOE should refrain from referencing documents not available for review.

Response:
Action:

16. Commenting Organization: Ohio EPA Commentor: DDAGW
Section #: 3.2.2.1 Pg #: 3-18 Line #: 15-24 Code:
Original Comment #:
Comment: The description of deposition and distribution of sand lenses in this paragraph conflict with the descriptions given by DOE in the 01/19/94 meeting. The technical information concerning the nature and continuity of the sand lenses in this report should be revised to reflect the information given in the 01/19/94 meeting.

Response:
Action:

17. Commenting Organization: Ohio EPA Commentor: DDAGW
Section #: 3.2.2.1 Pg #: 3-19 Line #: 18-19 Code:
Original Comment #:
Comment: If the till is saturated, then the till itself may be a significant hydraulic connection to the Great Miami Aquifer system.

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Response:
Action:

- 18) Commenting Organization: Ohio EPA Commentor: DDAGW
 Section #: 3.2.2.1 Pg #: 3-19 Line #: 27-30 Code:
 Original Comment #:
 Comment: Since no site has been selected, and no individual area has been shown to meet siting criteria, DOE must have a plan of action to be followed if the ARAR's cannot be met.

Response:
Action:

- 19) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 3.3.2.6 Pg #: 3-123 Line #: 8-19 Code: c
 Original Comment #:
 Comment: This alternative should not be retained for detailed analysis. The alternative can not be retained "because of its potential to be protective of ...". The threshold criteria are either met or not. Potentially being protective is not sufficient. Additionally, the alternative does not meet the NCP's statutory preference for treatment. The alternative should be screened from detailed analysis.

Response:
Action:

- 20) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 3.3.3.3 Pg #: 3-129 Line #: 2-4 Code: c
 Original Comment #:
 Comment: Neither Section 3.3.3.3 nor 4.4.2 provide an explanation for the \$24 million decrease in the cost of this alternative from the previous version of the FS. It would seem the change simply resulted from an attempt to ensure on-property disposal was cheaper than off-site disposal.

Response:
Action:

- 21) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 3.3.3.4 Pg #: 3-130 Line #: 1-5 Code: c
 Original Comment #:
 Comment: The language used in this section should be the same as that used in Section 3.3.1.4 (i.e., "Long term reliability is likely greater than that of alternative 2C because the material would be disposed off site in a remote location ...).

Response:
Action:

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22. Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 3.4.2 Pg #: 3-136 Line #: Code: c
 Original Comment #:
 Comment: As stated previously, Alternative 4B should be screened. It should be eliminated on the same basis as Alt. 3B.2, protectiveness cannot be assured and the goals of reduction/treatment cannot be met.

Response:
 Action:

23) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 4.2.2.2 Pg #: 4-35 Line #: 25-26 Code: e
 Original Comment #:
 Comment: The first sentence in this paragraph should be reviewed and revised to correct the typo.

Response:
 Action:

24) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 4.2.2.2 Pg #: 4-37 Line #: 28-30 Code: c
 Original Comment #:
 Comment: The section fails to address the siting requirements excluding waste disposal over a wetland. All disposal facilities proposed within the FS impact wetlands. DOE must discuss how it intends to comply with this criteria.

Response:
 Action:

25) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 4.2.2.6 Pg #: 4-66 Line #: 18-20 Code: c
 Original Comment #:
 Comment: The presence of the disposal vault over contaminated groundwater may impact the ability of groundwater monitoring to determine the integrity of the disposal vault. If the groundwater is already contaminated, it will be difficult or impossible to determine any contamination that may be resulting from the disposal vault.

Response:
 Action:

26) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 4.2.2.7 Pg #: 4-68 Line #: 10-12 Code: c
 Original Comment #:
 Comment: In response to Ohio EPA' 11/9/93 comments, the number of trucks associated with this and other alternatives were significantly reduced. This reduction in trucks and associated personnel are not reflected in any reduction in costs for these alternatives. It would

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seem such a significant reduction in material and labor cost would have some impact on cost.

Response:
Action:

- 27) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.2.2.7 Pg #: 4-72 Line #: 18-21 Code: c
Original Comment #:
Comment: This section and subsequent sections on the disposal vault and packaging contain significant errors in basic math. Ohio EPA comments on the previous version of the FS address problems with packaging calculations. Based upon the assumptions presented 2m³ per package and 2412 packages, the size of the disposal vault must be 4824 m³ not the 4372 m³ stated.

Response:
Action:

- 28) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.2.2.7 Pg #: 4-73 Line #: 1-4 Code: c
Original Comment #:
Comment: As stated in OEPA comments on the previous version, it is still unclear whether DOE is assuming a completely full container. DOE's response to OEPA comments suggested the packages were designed, based on the mass of the waste material, to be completely filled. Based upon the assumptions presented (2412 packages, 1.2 m³ storage space per package), the available package volume will be 2894 m³ while only 2770 m³ is need. This results in approximately 124 m³ of wasted space or approximately 100 wasted packages. At \$955 per package, this is a significant discrepancy. DOE must review the section and revise for consistency. Additionally, DOE should discuss within the section if the package will be filled completely or not and provide the waste form's weight per volume estimate used in the calculation of packaging requirements.

Response:
Action:

- 29) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.2.3.7 Pg #: 4-82 Line #: 15-17 Code: c
Original Comment #:
Comment: As stated in a previous, comment a significant reduction in truck traffic has occurred since the previous version yet no subsequent reduction in cost is realized. DOE should explain why costs were not impacted.

Response:

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Action:

- 30) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.2.3.7 Pg #: 4-84 Line #: 27-30 Code: c
Original Comment #:
Comment: Based upon the assumptions presented 2m³ per package and 15009 packages, the size of the disposal vault must be 30018 m³ not the 27204 m³ stated.

Response:
Action:

- 31) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.2.3.7 Pg #: 4-85 Line #: 10 Code: c
Original Comment #:
Comment: Based upon the assumptions presented (15009 packages, 1.2 m³ storage space per package), the available package volume will be 18010 m³ while 18274 m³ is need. This results in approximately 264 m³ of unpackaged waste or being short 220 packages. At \$955 per package, this is a significant discrepancy. DOE must review the section and revise for consistency. Additionally, DOE should discuss within the section if the package will be filled completely or not and provide the waste form's weight per volume estimate used in the calculation of packaging requirements.

Response:
Action:

- 32) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.2.4.7 Pg #: 4-97 Line #: 13-16 Code: c
Original Comment #:
Comment: The section states that it used the same assumptions as for Alternative 2A/Vit, yet when the costs for waste processing are compared Alternative 3A/Vit costs \$1.05 million more. DOE must justify this additional cost or correct the Alternative 3A/Vit cost.

Response:
Action:

- 33) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.2.4.7 Pg #: 4-98 Line #: 10-12 Code: c
Original Comment #:
Comment: DOE must clarify the assumptions used to generate the disposal costs presented in Table 4-5 vs. the assumptions presented in the text. Based upon the assumptions in the text (2412 packages, 2 m³ per package, \$353/m³), the disposal costs would be \$1,702,872 not the 1,302,500 presented in Table 4-5.

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Response:
Action:

- 34) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.2.5.7 Pg #: 4-105 Line #: 10-13 Code: c
Original Comment #:
Comment: The section states that it used the same assumptions as for Alternative 2A/Vit, yet when the costs for waste processing are compared Alternative 3A/Cem costs \$1.05 million more. DOE must justify this additional cost or correct the Alternative 3A/Cem cost.

Response:
Action:

- 35) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.2.5.7 Pg #: 4-106 Line #: 1-3 Code: c
Original Comment #:
Comment: DOE must clarify the assumptions used to generate the disposal costs presented in Table 4-6 vs. the assumptions presented in the text. Based upon the assumptions in the text (15009 packages, 2 m³ per package, \$353/m³), the disposal costs would be \$10,596,354 not the 8,104,800 presented in Table 4-6.

Response:
Action:

- 36) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.3.2.7 Pg #: 4-141 Line #: 6-9 Code: c
Original Comment #:
Comment: Based upon the assumptions presented, 2m³ per package and 2412 packages, the size of the disposal vault must be 4824 m³ not the 2324 m³ stated.

Response:
Action:

- 37) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.3.2.7 Pg #: 4-141 line: 26 Code: c
Original Comment #:
Comment: As stated in OEPA comments on the previous version, it is still unclear whether DOE is assuming a completely full container. DOE's response to OEPA comments suggested the packages were designed, based on the mass of the waste material, to be completely filled. Based upon the assumptions presented (2412 packages, 1.2 m³ storage space per package), the available package volume will be 2894 m³ while only 1471 m³ is need. This results in approximately 1423 m³ of wasted space or approximately 1,185 wasted packages. At \$955 per package, this is a significant discrepancy. DOE must review the section and

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revise for consistency. Additionally, DOE should discuss within the section if the package will be filled completely or not and provide the waste form's weight per volume estimate used in the calculation of packaging requirements.

Response:
 Action:

- 39) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 4.3.3.7 Pg #: 4-152 Line #: 18-22 Code: c
 Original Comment #:
 Comment: Based upon the assumptions presented 2m³ per package and 4957 packages, the size of the disposal vault must be 9914 m³ not the 8984 m³ stated.

Response:
 Action:

- 40) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 4.3.3.7 Pg #: 4-152 Line #: 28-31 Code: c
 Original Comment #:
 Comment: Based upon the assumptions presented (4957 packages, 1.2 m³ storage space per package), the available package volume will be 5948 m³ while 5999 m³ is need. This results in approximately 51 m³ of unpackaged waste or being short 43 packages. DOE must review the section and revise for consistency. Additionally, DOE should discuss within the section if the package will be filled completely or not and provide the waste form's weight per volume estimate used in the calculation of packaging requirements.

Response:
 Action:

- 41) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 4.3.4.7 Pg #: 4-161 Line #: 18-21 Code: c
 Original Comment #:
 Comment: The section states that it used the same assumptions as for Alternative 2B/Vit, yet when the costs for waste processing are compared Alternative 3B.1/Vit costs \$1.05 million more. DOE must justify this additional cost or correct the Alternative 3B.1/Vit cost.

Response:
 Action:

- 42) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 4.3.4.7 Pg #: 4-162 Line #: 15 Code: c
 Original Comment #:
 Comment: DOE must clarify the assumptions used to generate the

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disposal costs presented in Table 4-9 vs. the assumptions presented in the text. Based upon the assumptions in the text (2412 packages, 2 m3 per package, \$353/m3), the disposal costs would be \$1,704,284 not the \$692,300 presented in Table 4-9.

Response:
Action:

- 43) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.3.5.7 Page#: 4-168 Line #: 23-26 Code: c
Original Comment #:
Comment: The section states that it used the same assumptions as for Alternative 2B/Vit, yet when the costs for waste processing are compared Alternative 3B.1/Cem costs \$1.05 million more. DOE must justify this additional cost or correct the Alternative 3B.1/Cem cost.

Response:
Action:

- 44) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.3.5.7 Pg #: 4-170 Line #: 13-14 Code: c
Original Comment #:
Comment: DOE must clarify the assumptions used to generate the disposal costs presented in Table 4-10 vs. the assumptions presented in the text. Based upon the assumptions in the text (4957 packages, 2 m3 per package, \$353/m3), the disposal costs would be \$3,499,642 not the \$1,308,600 presented in Table 4-9.

Response:
Action:

- 45) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.3.6 Pg #: 4-172 Line #: Code: c
Original Comment #:
Comment: As stated previously, OEPA does not believe this alternative should pass through screening to detailed analysis. Additionally, what basis does DOE have for evaluating an on-site no treatment option without considering an off-site no treatment option?

Response:
Action:

- 46) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.3.6.7 Pg #: 4-186 Line #: 14-16 Code: c
Original Comment #:
Comment: The section should be revised to be consistent with other disposal vault sections within the document. Use metric volume to be consistent.

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Response:
Action:

- 47) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.3.6.7 Pg #: 4-186 Line #: 17-19 Code: c
Original Comment #:
Comment: Based upon the assumptions presented in the text (3,195 containers, 1.2 m³/container), 3834 m³ of package volume will be available while at least 3895 m³ will be needed. This results in at least 61 m³ of unpackaged material or being short 51 containers. DOE must revise its package and cost estimates. Additionally, DOE should discuss within the section if the package will be filled completely or not and provide the waste form's weight per volume estimate used in the calculation of packaging requirements.

Response:
Action:

- 48) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.4.2 Pg #: 4-198 Line #: 11-15 Code: c
Original Comment #:
Comment: The text should also state that if an off-property disposal option is chosen for OU3 or OU5 wastes an ESD or ROD amendment to the OU4 ROD would not be necessary. The only circumstance under which an ESD or ROD amendment would be necessary would be if the OU4 wastes are dispositioned inconsistent with the OU3 and OU5 RODs.

Response:
Action:

- 49) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.4.2 Pg #: 4-206 Line #: 21-29 Code: c
Original Comment #:
Comment: The text should discuss the ARAR or TBC which requires the intrusion or radon barriers for Subunit A and B wastes but not C wastes. The text should define the legal basis for not requiring the barrier for Subunit C wastes.

Response:
Action:

- 50) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.4.2.3 Pg #: 4-213 Line #: 6-10 & 13-15 Code: c
Original Comment #:
Comment: Ohio EPA's 11/9/93 comments address the fact that simply backfilling with soil was not an acceptable method for risk reduction and that the contaminated soils would need closure in compliance with Ohio law. DOE's response was that the risk assessments did not take

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into account the six inches of cover soil. This section of text suggests that the cover soil is essential for reducing risk to an acceptable level. Additionally, DOE's response to USEPA Radiation Section Comment #24 suggests the risk assessment did use the backfill as a method of risk reduction. This issue remains unresolved with regard to the role of the six inches of cover soil in risk reduction and the need to proper closure of the contaminated soils.

Response:
 Action:

- 51) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 4.4.2.7 Pg #: 4-222 Line #: Code: c
 Original Comment #:
 Comment: a) The previous version of this document included packaging for on-property disposal, as do all prior sections of this version. DOE must provide justification for the elimination of packaging for the on-property disposal of Subunit C wastes.
 b) DOE must justify the fact that no "During Remediation O&M costs" are provided for this alternative as are provided for on-property disposal options for Subunit A & B wastes.

Response:
 Action:

- 52) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 4.4.2.7 Pg #: 4-224 Line #: 21-25 Code: c
 Original Comment #:
 Comment: The section does not provide a volume estimate for total amount of Subunit C waste requiring disposal. The proposed vaults have a capacity of 37,400 m³ while the total from lines 1-16 is just 14,328 m³. DOE should define the volume of waste used in the cost calculations.

Response:
 Action:

- 53) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 4.4.3.7 Pg #: 4-234 Line #: 1-4 Code: c
 Original Comment #:
 Comment: This bullet suggests the storage volume of the waste container is 2 m³ while the rest of the document reports it as 1.2 m³. The text should be revised to be consistent with the rest of the document and calculations reviewed to ensure correctness.

Response:
 Action:

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- 54) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.4.3.7 Pg #: 4-234 Line #: 5-8 Code: c
Original Comment #:
Comment: The section should include the volume of all Subunit C waste to be disposed, including soils. DOE must provide the volume used in cost calculations.

Response:
Action:

- 55) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.4.3.7 Pg #: 4-234 Line #: 24-26 Code: c
Original Comment #:
Comment: Based upon the assumptions provided in the text (26,215 containers, 2 m³/container, \$353/m³) the disposal cost should be \$18,507,790 not the \$11,229,000 reported in Table 4-15.

Response:
Action:

56. Commenting Organization: Ohio EPA Commentor: DERR
Section #: 4.4.4.7 Pg #: 4-242 Line #: Code: c
Original Comment #:
Comment: The section should provide the volume of Subunit C waste used in the cost estimates for this alternative. It is obvious a different volume was used for the calculations of alternative 3C.1 and 3C.2. This is determined by dividing the total disposal cost by the per unit volume cost in each alternative. The result suggests that 34958 m³ was used in 3C.2, while 31810 m³ was used for 3C.1. DOE must provide a justification for this discrepancy.

Response:
Action:

57. Commenting Organization: Ohio EPA Commentor: DERR
Section #: Table 5-3 Pg #: 5-5 Line #: Code: c
Original Comment #:
Comment: On-property disposal should not be defined as most reliable. To be consistent with Tables 5-1 and 5-2 as well as all previous text in the FS, only Alternatives 3C.1 and 3C.2 should be defined as most reliable.

Response:
Action:

- 58) Commenting Organization: Ohio EPA Commentor: DERR
Section #: Table 5-5 Pg #: 5-11 Line #: Code: c
Original Comment #:

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Comment: As stated in OEPA's 11/9/93 Comment #55:

a) Table 4-13 contradicts the B.S.L designation for subunit C alternatives for the future on-property farmer. Table 4-13 suggests the radiological ILCR would be $>1 \times 10^{-3}$ for the future on-property farmer. Additionally, footnote "f" is not appropriate for 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", and "h" are not included within the table. Delete the footnotes or include them in the table.

DOE's response to this comment suggested the table would be revised but no changes were made.

Response:

Action:

59) Commenting Organization: Ohio EPA Commentor: DERR
Section #: Table 5-8 & 5-9 Pg #: 5-38 & -40 Line #: Code: c
Original Comment #:
Comment: These tables fail to incorporate alternative 4B.

Response:

Action:

60. Commenting Organization: Ohio EPA Commentor: DERR
Section #: Table 5-10 Pg #: 5-46 Line #: Code: c
Original Comment #:
Comment: These tables fail to include any O&M during remediation costs as to the on-property disposal options for Subunit A & B wastes. DOE must provide a justification for the deletion of this costs from Alternative 2C.

Response:

Action:

61. Commenting Organization: Ohio EPA Commentor: DERR
Section #: Table D.III-1 Pg #: D-III-6 Line #: Code: c
Original Comment #:
Comment: What is DOE's basis for the exposure point concentrations used to calculate the on-property resident farmer risks? It would seem reasonable that these concentrations should be the same as the proposed remediation levels.

Response:

Action:

Proposed Plan Comment

62. Commenting Organization: Ohio EPA Commentor: DERR

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Section #: 1.0 Pg #: 2 Line #: Code: c
Original Comment #:

Comment: There needs to be additional clarification in the paragraphs concerning NEPA/CERCLA integration. Explain why these need to be integrated; what their differences are; is the EIS for OU4 applicable to the entire site; and why EISS have not been prepared for each OU. The experiences with public comment on the OU3 Proposed Plan support the need for additional clarification of the nuances of CERCLA/NEPA integration.

Response:

Action:

63. Commenting Organization: Ohio EPA Commentor: DERR
Section #: 2.4.1 Pg #: 9 Line #: 18-21 Code: c

Original Comment #:

Comment: A brief explanation and history of the Radon Treatments System should be included.

Response:

Action:

64. Commenting Organization: Ohio EPA Commentor: DERR
Section #: 2.4.1 Pg #: 11 Line #: 27-35 Code: c

Original Comment #:

Comment: DOE should state within this paragraph that groundwater is being addressed by OU5. This will prevent the confusion which occurs when the reader reaches page 16.

Response:

Action:

65. Commenting Organization: Ohio EPA Commentor: DERR
Section #: 2.4.1 Pg #: 12 Line #: Code: c

Original Comment #:

Comment: DOE should consider the addition of a water table diagram with flow direction to enhance comprehension of this section.

Response:

Action:

66. Commenting Organization: Ohio EPA Commentor: DERR
Section #: 2.4.1 Pg #: 12 Line #: 5-16 Code: c

Original Comment #:

Comment: DOE should provide a brief reference to other contaminants and their respective concentrations detected in the perched groundwater within OU4.

Response:

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Action:

67. Commenting Organization: Ohio EPA Commentor: DERR
Section #: 2.4.1 Pg #: 12 Line #: 17-31 Code: c
Original Comment #:

Comment: In this section it is concluded that there is "no apparent link between contamination in the GMA and OU4." However, the contamination numbers range from 1 to 40.3 ug/l which seem significant enough to have some effect and therefore to negate the above assumption. DOE should provide some additional discussion within the text as to why OU4 contamination can not be conclusively tied to the GMA contamination.

Response:

Action:

68. Commenting Organization: Ohio EPA Commentor: DERR
Section #: 6.3.3 Pg #: 80 Line #: 7-16 Code: c
Original Comment #:

Comment: Ohio EPA believes the preferred alternative should be 3C.2 because of increased certainty of long term protection of human health and the environment, uncertainty associated with 2C's ability to comply with ARARs (OAC 3745-27-07(B)(5)), 3C.2 is likely to be more implementable than 2C, since DOE has yet to define a location on-property which can comply with OAC 3745-27-07(B)(5). DOE may wish to refrain from drawing a conclusion in this section and defer it to the OU5 and OU3 decisions.

Response:

Action: