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**DOE-FEMP HAMILTON COUNTY OU1 PROPOSED PLAN - PUBLIC
COMMENTS**

08/24/94

OEPA DOE-FN
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COMMENTS



State of Ohio Environmental Protection Agency

Southwest District Office

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5880

George V. Voinovich
Governor

August 24, 1994

RE: DOE FEMP
HAMILTON COUNTY
OU1 PROPOSED PLAN -
PUBLIC COMMENTS

Mr. Gary Stegner
Director, Public Information
U.S. DOE Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Stegner:

The purpose of this letter is to provide official comments on the Operable Unit 1 Proposed Plan:

1. The OU1 Proposed Plan is the culmination of efforts by U.S. DOE, Ohio EPA, and U.S. EPA to understand and develop a plan for mitigating releases to the environment from OU1. Ohio EPA believes the alternative selected in the Proposed Plan is the most protective alternative with regard to human health and the environment. Ohio EPA supports DOE's selection of Alternative 5B and looks forward to its expeditious implementation.
2. Ohio EPA is concerned that DOE has developed a Proposed Plan calling for disposal of the OU1 waste at a commercial facility, yet DOE Order 5280.2A precludes disposal at a commercial facility. Ohio EPA understands that a waiver of this Order has been requested, but DOE Headquarters has failed to act upon it. DOE HQ must address the need for a waiver of this Order. Ohio EPA expressed concerns with DOE's failure to address this issue during the development of the OU3 Interim Record of Decision and Proposed Plan. At that time DOE committed to addressing issues precluding disposal at Envirocare within OU1. To date DOE has not met this commitment. Ohio EPA believes that DOE must complete the waiver of this Order and address other issues precluding disposal at Envirocare prior to finalizing the OU1 ROD. The need for DOE to take action on its own waiver is especially relevant considering DOE is asking USEPA to waive Ohio's Solid Waste Siting Criteria for on-site disposal of other operable unit wastes. Ohio EPA's support of such a waiver could only be considered once DOE has fulfilled the commitment to waiving 5280.2A.
3. In order for DOE to effectively and safely implement the preferred alternative, Ohio EPA feels it is critical for DOE to ensure the quality and integrity of railroad line between the

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Mr. Stegner
August 24, 1994
Page 2

site and Cottage Grove, Indiana. A number of citizen concerns have been expressed over the past month concerning this railway. Ohio EPA expects DOE will address all reasonable requests.

4. Due to significant public concern with regard to emergency preparedness, Ohio EPA encourages DOE to expand its outreach activities to local first responders along the train route in Ohio and Indiana. These activities could include training, mock exercises, etc involving multiple agencies and fire departments. Ohio EPA would gladly participate in these activities .
5. DOE should commit to including and/or developing real-time monitoring for discharges to the environment resulting from remedial actions including any treatment system. DOE should attempt to incorporate any new developments in real-time monitoring from the Office of Technology Development. Data obtained from real-time monitors and any additional monitoring activities should be provided to the Ohio EPA and public in a timely manner.
6. DOE should attempt to incorporate pollution prevention activities whenever possible during the design and operation of the OU1 remedial action system. All available methods to reduce or eliminate discharges from the treatment system should be considered during the design of the system.
7. DOE must ensure the public that their involvement will not be diminished during Remedial Design and Remedial Action (RD/RA). DOE should commit within the Record of Decision for OU1 to maintaining the exceptional on-going public involvement during RD/RA .
8. DOE should revise the site Community Relations Plan to address the need for continued public involvement during the RD/RA. Ohio EPA looks forward to working with DOE to revise this document.

If you have any questions concerning these comments please contact me at (513) 285-6466.

Sincerely,



Thomas A. Schneider
Project Manager

5880

Mr. Stegner
August 24, 1994
Page 3

cc: Lisa Crawford, FRESH
Jack Van Kley, Ohio AGO
Jim Saric, USEPA
Ken Alkema, FERMCO
Lisa August, Geotrans
Jean Michaels, PRC
Manger TPSU, OEPA/DERR
Jeff Hurdley, OEPA/Legal
Robert Owen, ODH
Jim Crawford, OEPA/Emergency Response

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