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U-005-455 .2

RE: DOE FEMP MSL#531-0297 OU3 RD/RA WP - COMMENTS

11/17/94

OEPA DOE-FN
~~10~~ / 16
COMMENTS



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

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November 17, 1994

RE: DOE FEMP
MSL #531-0297
OU3 RD/RA WP-
COMMENTS

Mr. Jack Craig
Acting Site Director
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, OH 45253-8705

Dear Mr. Craig:

This letter provides Ohio EPA comments on the Operable Unit 3 Remedial Design/Remedial Action Work Plan and the Building 4A Implementation Plan submitted to Ohio EPA on September 20, 1994. The document should be revised to incorporate these comments and re-submitted for agency review. Ohio EPA is available to meet to resolve these comments in order to expedite resolution.

If you should have any questions, please contact Tim Hull or me.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric U.S. EPA
Terry Hagen, FERMCO
Robert Owen, ODH
Jean Michaels, PRC
Manager TPSS, DERR
Lisa August, GeoTrans

(Shah(A)
Action response
to R-2233
(8349)

000001

Ohio EPA Comments on the
OU3 RD/RA Work Plan for Interim Remedial Action
and the Building 4A Implementation Plan

General Comments:

1. Commenting Organization: OEPA Commentor: GeoTrans
Section #: Pg.#: Line #: Code: C
Original Comment #

Comment: Organization of Project Responsibility:
One of the major difficulties with the document are definitions of responsibility. A clear organization chart defining lines of responsibility among the various organizations and the design/engineering/construction teams is needed. Please define the organization's roles more explicitly.

Response:
Action:

2. Commenting Organization: OEPA Commentor: GeoTrans
Section #: 3 & 4 Pg.#: Line #: Code: C
Original Comment #

Comment: Section 3 reviews the overall strategy and discusses discrete tasks (e.g., planning and design documents), but fails to describe how these processes are accomplished and delivered. The narrative is not clear on who is performing the task functions, and the nature of the deliverable.

Section 3 has a substantial amount of forward-reference to Section 4, which deals with the Task Plan description. Section 4, conversely back-references Section 3, because the Section 4 tasks are not fully described. This mutual reference could be eliminated by combining the two sections into a more coherent narrative. As written, the two sections are inconsistent and unnecessarily overlap.

Response:
Action:

3.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Comment Pg #: Line #: Code: C
Original Comment #:

Comment: This document does not have sufficient detail needed for approval. OFFO realizes that certain specific details will change with the demolition of each building, but FEMP needs to develop a plan of action that is applicable for all demolition and removal projects. This plan should include basic details on the control of air emissions and the monitoring of these emissions. A plan needs to be implemented for environmental monitoring before, during and after demolition with an emphasis on air

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monitor placement and analysis. This data will need to be submitted in addition to addressing the following comments.

Response:

Action:

4.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: General Comment Pg #: Line #: Code: C

Original Comment #:

Comment: Within the OU-3 RD/RA text, several orders, documents and other publications are referenced. The FEMP needs to include this referenced data, not just include the mention of it's existence within the text.

Response:

Action:

Specific Comments:

5. Commenting Organization: OEPA Commentor: GeoTrans

Section #: 1 Pg.#: 1-3 Line #: 11 Code: C

Original Comment #

Comment: The role of the Work Plan as a framework document would be better served if a list of subsequent projects were identified here. It is not clear what is meant by "replacing multiple design and construction submittals for each decontamination and dismantlement project." This does not lend guidance on how to frame the design and construction submittals nor does this statement explain how these detailed submittals can be "replaced." Construction submittals would take place after the Implementation Plan is issued. Therefore, how could it replace them?

Response:

Action:

6. Commenting Organization: OEPA Commentor: GeoTrans

Section #: 1 Pg.#: 1-3 Line #: 22, 23, and 26 Code: C

Original Comment #

Comment: The reader should be referred to another document or appendix to identify the over 200 components referred to here. Also please define the \$750 million in present worth dollars for which year. Does this cost include administration (DOE) and sunk costs as well as remediation costs?

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The "initial" group of projects should either be defined, or the reader referred to the appropriate section to identify them.

Response:

Action:

7.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.0 Pg #: 2-1 Line #: 5 Code: c

Original Comment #:

Comment: Please change the reference to the 1992 Annual Site Environmental Report to the 1993 Annual Site Environmental Report.

Response:

Action:

8.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.2 Pg #: 2-5 Line #: 26 Code: c

Original Comment #:

Comment: Table A.2.1 in the OU3 RI/FS WPA would be useful if inserted in this section, as it provides more descriptive information about OU3 components.

Response:

Action:

9.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: General Comment Pg #: Line #: Code: c

Original Comment #:

Comment: It seems that this document has an inordinant amount of cross-referencing other sections of other documents. To make the document more user friendly, summary tables of these sections should be included within the text.

Response:

Action:

10.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2 Pg #: 11 Line #: 14 Code: g

Original Comment #:

Comment: Please provide a definitive schedule for removal of pads , ponds, basins, underground utilities, and other at-and below-grade structures or define which document will provide such a schedule.

Response:

Action:

11. Commenting Organization: OEPA Commentor: GeoTrans

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Section #: 3 Pg.#: 3-2 Line #: 21 Code: C

Original Comment #

Comment: Planning activities are performed to address remedial design and remedial action. The first stage was performed and presented in the subject Work Plan. The second stage of the process, resulting in a sequence and schedule, will be presented in which document?

Response:

Action:

12. Commenting Organization: OEPA Commentor: GeoTrans

Section #: 3 Pg.#: 3-3 Line #: 18 Code: C

Original Comment #

Comment: A well-defined scope of work is mentioned as necessary to support the firm-fixed-price construction contracts. The scope of work is not mentioned hereafter in the documents. Please provide a discussion of the scope of work. Is it to be part of the specifications?

Response:

Action:

13. Commenting Organization: OEPA Commentor: GeoTrans

Section #: 3 Pg.#: 3-3 & 3-4 Line #: 18-19; & 1-8 Code: C

Original Comment #

Comment: DOE mentions that design document preparations for firm-fixed-price construction contracts require realistic estimates of proposed costs. DOE proceeds to indicate performance specifications would be used when possible. How does the design subcontractor select a method for remediation based on design performance specifications that will produce a realistic cost estimate? Does the contractor assume clean-up criteria responsibility? If so, the contractor must provide a detailed remedial action work plan that demonstrates the ability to perform an acceptable cleanup.

Response:

Action:

14.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3.1.3 Pg.#: 3-4 Line #: Code: c

Original Comment #:

Comment: The Ohio EPA recommends that implementation plans be of similar detail to the D&D design package.

Response:

Action:

15. Commenting Organization: OEPA Commentor: GeoTrans

Section #: 3 Pg.#: 3-5 Line #: 18 Code: C

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Original Comment #

Comment: The remediation subcontractor work will be supervised by DOE's environmental management contractor. This statement does not link well with Section 7.0 which discusses the various management organizations. Section 7 states that Construction is responsible for managing the implementation of the remedial action.

The distinction between department and contractor, both involved in the same operation at different levels, is not made. The document should identify the entities involved, including DOE departments and contractors, within each phase of the projects.

Response:

Action:

16.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3 Pg #: 7 Line #: 7 Code: g

Original Comment #:

Comment: Please list here the nine major processing facilities.

Response:

Action:

17.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.2.3 Pg #: 3-9 Line #: 21 Code: c

Original Comment #:

Comment: The text states that a base schedule will be developed to plan interim remedial measures over the 16 year period. When will this plan be developed and submitted?

Response:

Action:

18.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.2.4 Pg #: 3-12 Line #: 1 Code: c

Original Comment #:

Comment: When will the five year schedule be developed and submitted?

Response:

Action:

19.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.2.6 Pg #: 3-14 Line #: 1 Code: e

Original Comment #:

Comment: Please change the sentence to read.... "the Ore Refinery Plant (2A) is currently planned to be used to neutralize uranyl nitrate.

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Response:

Action:

20. Commenting Organization: OEPA Commentor: GeoTrans
Section #: 3 Pg.#: 3-32 Line #: 11-16 Code: C
Original Comment #

Comment: Material Segregation is apparently based on what the material is or was used for, not on analytical work which determines the level of contamination. This fundamental assumption of what is contaminated and what is not should be explained more clearly.

Response:

Action:

21. Commenting Organization: OEPA Commentor: GeoTrans
Section #: 3 Pg.#: 3-45 Line #: Code: C
Original Comment #

Comment: Remedial actions identified as not part of the Interim Remedial Action are not always clear. For example asbestos removal is covered under an existing removal action (No. 26), yet asbestos removal is required within the Work Plan. Safe shutdown is described in various terms: (1) as a phase of the OU3 Interim Remedial Action (page 3-15); (2) as an action to be coordinated with the IRA (page 3-46, line 15); and (3) in the Implementation Plan for Building 4A as not within the scope of the IRA. Please resolve these inconsistencies in terminology and definition.

Response:

Action:

22. Commenting Organization: OEPA Commentor: GeoTrans
Section #: 3 Pg.#: 3-47 Line #: 9 to 20 Code: C
Original Comment #

Comment: The distinct asbestos programs are addressed: (1) the existing Removal No. 26 action; and (2) the removal of ACM in the scope of work of the remediation contractor. Neither activity is described adequately, nor are source documents referenced to clarify the division of responsibility. Please clarify.

Please define "maintenance related asbestos abatement activity."

Response:

Action:

23. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3 Pg #: 48 Line #: 13 Code: g

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Original Comment #:

Comment: The use of existing rail sidings or the construction of new sidings for the transportation of OU1 wastes will require coordination with OU3.

Response:

Action:

24) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3.5.4 Pg #: 3-49 Line #: 12-16 Code: c

Original Comment #:

Comment: It is recommended that DOE not reference proposed document submittal dates. Please delete the reference to the OU5 draft FS(June 1994), November 1994 may be substituted for that date. Also, please delete the reference to the final OU5 FS report being submitted in November 1994.

Response:

Action:

25) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3 Pg #: 49 Line #: 16 Code: e

Original Comment #:

Comment: This is an incomplete sentence.

Response:

Action:

26. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3 Pg #: 3-53 Line #: Code: C

Original Comment #:

Comment: Several times within this section, the FEMP refers to dose to the general public from air emissions in millirems/year. Air monitoring in the field during any activities will yield results in picocuries/cubic meter, thus requiring the sampler to convert readings in the field. The FEMP should have the dose converted to pCi/cubic meter to have an implementable performance specification in the field. By not having this performance specification, if air emissions exceed regulatory limits and activity needs to be suspended, valuable time could be lost in the time it takes to perform this conversion.

Response:

Action:

27. Commenting Organization: OEPA Commentor: GeoTrans

Section #: 4 Pg #: 4-2 Line #: 22 Code: C

Original Comment #

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Comment: What organization will be responsible for dividing the components of OU3 into complexes, and how will it be documented? Are the proposed criteria for division of components the most effective?

Response:

Action:

28.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 4 Pg #: 13 Line #: 11 Code: g

Original Comment #:

Comment: Please state who will review the remediation subcontractor's work plan and provide a copy of this plan to OEPA.

Response:

Action:

29. Commenting Organization: OEPA Commentor: GeoTrans

Section #: 4 Pg #: 4-16 Line #: 15 Code: C

Original Comment #

Comment: Implementation plans should also cover design specific information on the remedial design. The list of tasks covered under implementation plans is so general that it does not describe what and how specific design information will be presented.

Response:

Action:

30. Commenting Organization: OEPA Commentor: GeoTrans

Section #: 4 Pg #: 4-21 Line #: 5-20 Code: C

Original Comment #

Comment: Where are the performance standards to be verified in the execution and oversight of work. If remedial designs are based on performance standards, then verification that these standards have been met is necessary.

Response:

Action:

31) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 6.1 Pg #: 6-1 Line #: 22 Code: c

Original Comment #:

Comment: This section states that the OU3 Remedial Design and Sequencing Report is discussed in further detail in section 6.4. There is no section 6.4. Please modify.

Response:

Action:

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32. Commenting Organization: OEPA Commentor: GeoTrans
Section #: 6 Pg.#: 6-2 Line #: 4 Code: C
Original Comment #

Comment: Implementation plans are discussed in Section 4.5.5, not 4.5.4. Please correct.

Response:

Action:

33. Commenting Organization: OEPA Commentor: GeoTrans
Section #: 6 Pg.#: 6-2 Line #: Figure 6-1 Code: E
Original Comment #

Comment: The generic schedule, Figure 6-1, should also show the Remedial Action Report(s), which relate to the Implementation Plan submittals and note that a given Implementation plan may include several RA reports.

Response:

Action:

34. Commenting Organization: OEPA Commentor: GeoTrans
Section #: 7 Pg.#: 7-1 Line #: 20 Code: C
Original Comment #

Comment: The responsibilities of the DEC team are not defined adequately. The role of the team is not incorporated into the sections on Engineering and Construction. The Preliminary Design is apparently the responsibility of the DEC team (see page 4-6, Figure 4-1), but this responsibility is not explicitly discussed anywhere in Section 7.

Response:

Action:

35. Commenting Organization: OEPA Commentor: GeoTrans
Section #: 7 Pg.#: 7-2 Line #: 18 Code: C
Original Comment #

Comment: Please explain how the engineering organization fits into the overall management structure. Does each DEC team have its own engineering organization? It is not clear why engineering does not have further responsibility for production of the Implementation Plans, which is assigned to Environmental.

Response:

Action:

36. Commenting Organization: OEPA Commentor: GeoTrans
Section #: 7 Pg.#: 7-3 Line #: 5 Code: C

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Original Comment #

Comment: Are the five-year schedules provided by the individual engineering organizations for each DEC team, as implied? Clarification is needed to distinguish between planning and engineering on a project level, versus an overall program level.

Response:

Action:

37. Commenting Organization: OEPA Commentor: GeoTrans

Section #: 7 Pg.#: 7-4 Line #: 11,12 Code: C

Original Comment #

Comment: Another example of the lack of clarity regarding project organization is the inclusion of Construction and other groups responsible for environmental project planning within "Environmental." Further along in the narrative, Construction and Environmental are discussed as separate organizations. Confusion would be minimized if the responsibilities of the functional organizations, subcontractors, departments, etc., are defined rather than inferred. Please clarify.

Response:

Action:

38.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 8.1 Pg.#: 15 H&S Plan Line #: 5 Code: C

Original Comment #:

Comment: The text states that "due to current technology limitations, 'real time' monitoring for airborne uranium and thorium will not be performed anytime in the near future at the FEMP." Consistent with OEPA's concurrence letter on the OU3 IROD, OEPA believes DOE must pursue real time monitoring for remediation activities. DOE should discuss current technology available through DOE OTD. DOE must be willing to investigate new developments in real time monitoring.

Response:

Action:

39. Commenting Organization: OEPA Commentor: GeoTrans

Section #: O&M Plan Pg.#: 3 Line #: 24-25 Code: C

Original Comment #

Comment: DOE states FEMP personnel may have to perform secondary size reduction. It would probably be more effective to perform size reduction once. Material size requirements should be part of the performance specifications and closely monitored by oversight personnel.

Response:

Action:

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Operable Unit 3 - Building 4A Implementation Plan

40. Commenting Organization: OEPA Commentor: GeoTrans
Section #: Pg.#: 1 Line #: 10 Code: C
Original Comment #

Comment: Building 4B will be available as an interim storage until it is available for remediation in another project. Does this imply that waste will be handled twice. Is a better storage location available?

Response:
Action:

41. Commenting Organization: OEPA Commentor: GeoTrans
Section #: Pg.#: 1 Line #: 15 Code: C
Original Comment #

Comment: The implementation plan "replaces" the submittal of multiple design and construction documents which have been prepared for this project. Please elaborate what technically is being replaced. Is the level of detail adequate to accomplish this replacement?

Response:
Action:

42. Commenting Organization: OEPA Commentor: GeoTrans
Section #: Pg.#: 2 Line #: 7 Code: C
Original Comment #

Comment: The preparatory actions: (1) removal of existing product and waste inventories; and (2) safe shut-down are described as not within the scope of the interim remedial action. These actions are clearly defined as Phases of Remedial Activities During the OU3 Interim Remedial Action in Volume One of the Work Plan, Page 3-15. Please correct or clarify both documents.

Response:
Action:

43. Commenting Organization: OEPA Commentor: GeoTrans
Section #: Pg.#: 2 Line #: 5 Code: C
Original Comment #

Comment: Will the implementation of Operable Unit 5 remediation take place in a timely manner to allow at and below-grade remediation?

Response:
Action:

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44. Commenting Organization: OEPA Commentor: GeoTrans
Section #: Pg.#: 2 Line #: 16 Code: C
Original Comment #

Comment: This appendix includes a list of the performance based specifications, not the specifications themselves. The statement is made that these specifications are appropriate; without the specifications this statement cannot be verified.

Response:

Action:

45) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2 Pg #: 4 Line #: Figure 1-1 Code: c
Original Comment #:

Comment: Figure 1-1 is not detailed enough to evaluate potential impacts of Building 4A remediation on adjacent areas. Provide detail such as that in a detailed design package.

Response:

Action:

46.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2 Pg #: 6 Line #: Table 2-1 Code: c
Original Comment #:

Comment: Please list the values for total alpha in this table.

Response:

Action:

47. Commenting Organization: OEPA Commentor: GeoTrans
Section #: Pg.#: 7 Line #: 3 Code: C
Original Comment #

Comment: The document refers to the Work Plan for additional detail on the management of primary materials. The Implementation Plan should provide additional detail beyond the original Work Plan, which is expected to be more general and less project specific. The Implementation Plan should allow the original strategies and general tasks to be more focussed and specific.

Response:

Action:

48.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2 Pg #: 7 Line #: 15 Code: c
Original Comment #:

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Comment: Not enough detail is presented on decontamination waters and the incentives that the sub-contractor will have to reduce the volume of secondary wastes that are generated. OEPA will also need more detail on the batch-wise collection of wash waters and the storage and sampling thereof. It is not clear when samples will be collected for wash waters and what the criteria are for sampling them.

Response:

Action:

49) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.3 Pg #: 10 Line #: Code: C
 Original Comment #:

Comment: The described environmental air monitoring program does not appear to be adequate to determine if excessive airborne releases are occurring. Samples that are collected weekly will not alert those in charge of health and safety of a problem until it is too late to take preventative measures (see Comment under Section 8.1 in the Health and Safety Plan). In addition, the FEMP has not provided a list of technologies under consideration to help control airborne contaminants. Please provide in the document a list of the alternatives available and a description of the method selected. OEPA has not seen any commitment to the development of real time air monitoring or to change this plan to utilize new air monitoring technologies as they develop.

Response:

Action:

50) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.3 Pg #: 10 Line #: Code: c
 Original Comment #:

Comment: Ohio EPA believes that an independent environmental manager should have the ultimate authority to shut down any operation that is not performing to best management practices. Activities would not resume until new work practices are implemented.

Response:

Action:

51. Commenting Organization: OEPA Commentor: GeoTrans
 Section #: Pg #: 14 Line #: 1 Code: C
 Original Comment #

Comment: Component-specific remediation should be referenced to the appropriate detailed performance specifications that apply.

Response:

Action:

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52) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3 Pg #: 14 Line #: 5 Code: c

Original Comment #:

Comment: OEPA would like more detail on the building. A simplified blueprint or a detailed schematic that delineates the process areas, and gives an idea of the layout of the various floors would probably be detailed enough. This should also show the closed RCRA storage area. Photographs of some of the more unusual or non-standard equipment would be helpful.

Response:

Action:

53) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3 Pg #: 16 Line #: 1 Code: c

Original Comment #:

Comment: It should be explicitly stated here that the residual materials mentioned here are RCRA wastes and that this HWMU has been clean-closed under RCRA.

Response:

Action:

54) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3 Pg #: 20 Line #: Table 3-2 Code: c

Original Comment #:

Comment: Please state explicitly the substances that comprise the hold-up material.

Response:

Action:

55) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3 Pg #: 22 Line #: Code: c

Original Comment #:

Comment: It appears that pipe wrapped in ACM will be disposed of as a unit. It seems that considerable cost savings would result if the pipe and the ACM were disposed of separately.

Response:

Action:

56) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3 Pg #: 23 Line #: 2 Code: c

Original Comment #:

Comment: This sentence is unclear. Is the criteria for radiological decontamination 1000dpm/100 cm² or 100dpm/100 cm²?

Response:

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Action:

57. Commenting Organization: OEPA Commentor: GeoTrans
Section #: Pg.#: 33 Line #: 2 to 17 Code: C
Original Comment #

Comment: The same comments on the Work Plan management organization apply here. The roles of the various organizations, and their interactions should be presented more clearly. The reference to the Work Plan should be programmatic issues; more project specific project management information should be provided.

Response:

Action: