

6428

U-006-504 .5

**U. S. DOE FEMP OPERABLE UNIT 4 RECORD OF DECISION
CONCURRENCE LETTER**

12/05/94

OEPA
2.
LETTER

DOE-FN/DOE-HQ



State of Ohio Environmental Protection Agency

P.O. Box 163669, 1800 WaterMark Dr.
Columbus, Ohio 43216-3669
(614) 644-3020
FAX (614) 644-2329

RECEIVED
OFFICE OF THE GOVERNOR 6428

FERNALD

LOG I-0847

DEC 08 1994

Dec 20 11 00 AM '94

George V. Voinovich
Governor

December 5, 1994

FILE: _____
LIBRARY: U.S. DOE FEMP
OPERABLE UNIT 4
RECORD OF DECISION
CONCURRENCE LETTER

Mr. Valdas Adamkus
Regional Administrator
U.S. EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Mr. Thomas Grumbly
Assistant Secretary for EM
U.S. Department of Energy
1000 Independence Avenue S.W.
Washington, D.C. 20585

Dear Mr. Adamkus & Mr. Grumbly:

The Ohio Environmental Protection Agency (Ohio EPA) has received and reviewed the November, 1994 final Operable Unit (OU) 4 Record of Decision (ROD) for the DOE FEMP Superfund Site in Hamilton County.

The OU4 ROD is the first of five RODs to be completed for the five operable units at the FEMP. The OU4 ROD addresses structures and contamination within the OU4 study area, including the K-65 Silos and the cold metal oxide silo. The selected remedial action will result in the removal, vitrification and off-site disposal of the silo residues. Contaminated debris and soils will be removed and dispositioned to Operable Units 3 and 5 respectively for treatment and final disposal. The selected alternative includes the following components:

- * Removal of the contents of Silos 1, 2, and 3 and the decant sump tank sludge.
- * Vitrification (glassification) to stabilize the residues and sludges removed from the silos and decant sump tank.
- * Off-site shipment for disposal at NTS of the vitrified contents of Silos 1, 2, 3, and the decant sump tank.
- * Demolition of Silos 1, 2, 3, and 4 and decontamination, to the extent practicable, of the concrete rubble, piping, and other generated construction debris.
- * Removal of the earthen berms and excavation of contaminated soils within the boundary of Operable Unit 4, to achieve remediation levels. Placement of clean backfill to original grade following excavation.
- * Demolition of the vitrification treatment unit and associated facilities after use. Decontamination or recycling of debris prior to disposition.
- * On- property interim storage of excavated contaminated soils and contaminated debris pending final disposition in accordance with the Records of Decisions for Operable Units 5 and 3, respectively.
- * Institutional controls of the Operable Unit 4 area such as deed and land use



Mr. Adamkus & Mr. Grumbly
December 5, 1994
Page 2

restrictions.

The estimated present worth cost of the selected interim remedy is \$91,738,000 in 1994 dollars. The remedial action is estimated to take eight years for completion.

Ohio EPA concurs with the selected remedial action. Ohio EPA feels strongly about several issues which DOE should address during implementation of the selected remedial action:

- Real-time monitoring for discharges should be used to the maximum extent possible during remedial actions. DOE should incorporate new developments in real-time monitoring during implementation of the remedy. Data from this monitoring should be provided to the Ohio EPA and public in a timely manner;
- Pollution prevention activities should be incorporated into the design and implementation of the selected remedial alternative. All available methods to reduce or eliminate discharges from the treatment system should be considered during the design of the system;
- Finally, DOE must maintain the high level of public participation and community involvement currently present at the FEMP throughout the Remedial Design and Remedial Action.

Ohio EPA believes DOE, USEPA, and the local community are also committed to seeing these issues addressed within the Remedial Design and Remedial Action.

The Ohio EPA's concurrence with the remedy selected for this operable unit should not be construed as agreement with the provisions of Section 10.7 of the Record of Decision regarding the irreversible or irretrievable commitment of natural resources at the site.

Ohio EPA supports the Operable Unit 4 Record of Decision and looks forward to DOE's expeditious implementation of the selected remedial action.

Sincerely,



Donald R. Schregardus, Director
Ohio Environmental Protection Agency

DRS/tas

cc: Jeff Hurdley, OEPA/Legal
Jack Van Kley, Ohio AGO
Jim Saric, USEPA
Jack Craig, USDOE

Robert Owen, ODH
Manager TPSS, DERR
Lisa Crawford, FRESH
Tom Schneider, OFFO