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U-005-455.16

CONDITIONAL APPROVAL IMP PLAN NITRATE

03/15/96

OEPA DOE-FN
3
COMMENTS



State of Ohio Environmental Protection Agency

Southwest District Office

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FERNALD
LOG J-1439

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George V. Voinovich
Governor

March 15, 1996

FILE: _____
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RE: DOE FEMP
MSL 531-0297
HAMILTON COUNTY
CONDITIONAL APPROVAL
IMP PLAN NITRATE TANKS

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

This letter serves as conditional approval of the "Operable Unit 3 Implementation Plan for the High and Low Nitrate Tanks" received by the Ohio EPA on February 23, 1996. The conditions of Ohio EPA approval are satisfactory incorporation of the attached comments. Also included are comments from the Ohio Department of Health, Bureau of Radiation Protection.

If you 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, FERMO
Ruth Vandergrift, ODH
Mike Proffitt, DD&GW
Sharon McLellan, PRC
Manager, TPSS/DERR, CO
Dave Ward, GeoTrans

IMPHILON.WPD

**Ohio EPA Comments on the OU3 Implementation Plan for the Above-Grade
Dismantlement of the High and Low Nitrate Tanks**

- 1.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: 3 Line #: 11 Code: C
Original Comment #:
Comment: Will the at and below-grade dismantlement of associated piping etc. occur prior to construction of remediation facilities for OU1 and the OSDF haul road, or will these facilities be constructed over the at and below-grade structures?
Response:
Action:
- 2.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: 4 Line #: 22 Code: C
Original Comment #:
Comment: What will be done with the wastewater which is drained from the two nitrate tanks? Will it be contained and treated in the AWWT?
Response:
Action:
- 3.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: 5 Line #: 8 Code: C
Original Comment #:
Comment: It would seem logical to remove the at and below-grade structures which are going to be built over by the long term remediation projects (ie. OSDF haul road, OU1 plant foundation) at the time of the tank dismantlement. It would seem that by constructing these remediation facilities over the at and below grade structures, it essentially leaves these structures to be removed last, with the possibility of being overlooked or forgotten. Please see comment #1 above.
Response:
Action:
- 4.) Commenting Organization: Ohio EPA Commentor: ODH, BRS
Section #: Pg #: 4 Line #: Code: C
Original Comment #:
Comment: Page 4, Characterization. A reference to a survey map of the "hot spots" and/or dose rates in proximity to each tank would be useful general information to include from the initial RI/FS sampling survey. In addition, the anomalies presented in the two prior characterization attempts from using two grab samples and samples "considered representative" did not yield results which are statistically valid. Development of a new sampling plan including gamma spectroscopic analysis of the sediment will provide additional insight into the characterization and ultimate disposition of this material.
Response:
Action:
- 5.) Commenting Organization: Ohio EPA Commentor: ODH, BRS

Section #: Pg #: 4 Line #: Code: C

Original Comment #:

Comment: Page 4, Preparatory Actions. As each tank is drained and the sludge removal begun, does the FEMP "Super Sucker" have sufficient capacity to finish the job before any drying and possible air transport of sludge occurs? It is not clear in the text if the tank covers will be off for the duration of the sixty days estimated to remove the sediment.

Response:

Action:

OU3HNTDD.WPD