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**COMMENTS - RA #12 STREAMLINING REPORTING**

04/14/96

OEPA            DOE-FN  
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COMMENTS



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State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street  
Dayton, Ohio 45402-2911  
(513) 285-6357  
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FERNALD  
5-1712  
APR 13 11 30 AM '96

George V. Voinovich  
Governor

April 17, 1996

RE: DOE FEMP  
MSL 531-0297  
HAMILTON COUNTY  
COMMENTS - RA#12  
STREAMLINING REPORTING

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

Dear Mr. Reising:

Ohio EPA has reviewed DOE's April 5, 1996 submittal "Proposal for Streamlining Reporting Requirements for Removal Action 12, Safe Shutdown." Ohio EPA is concerned with language in the proposal stating "It is proposed that future submissions be provided on an as-needed basis when revised procedures cause programic (sic) changes to Removal Action 12." This language does not sufficiently define the bounds for submitting changes to the agencies for review and approval. Ohio EPA requests that DOE revise the request to specifically define instances where submission of changes is required or not. Examples of each would be helpful.

As RA#12 is an integral part to DOE's proposal for OU3 remediation and disposition of materials, it is necessary that any procedure revision impacting waste removal or treatment be submitted for Ohio EPA review and approval.

If you have any questions feel free to contact me at (513) 285-6466.

Sincerely,

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

cc: Jim Saric, U.S. EPA  
Terry Hagen, FERMCO  
Ruth Vandergrift, ODH

Manager, TPSS/DERR,CO  
Dave Ward, GeoTrans  
Sharon McLellan, PRC

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Project  
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