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**OEPA'S RESPONSE TO DOE-ORO COMMENTS ON THE FERNALD AND MO
AIP**

06/03/1997

**OEPA
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RESPONSE**

DOE-ORO/DOE-FEM



State of Ohio Environmental Protection Agency

FERNALD

LOC K-1711

Southwest District Office

401 East Fifth Street
Dayton, OH 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6240

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George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

FILE: _____
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June 3, 1997

Mr. Mark Million
Contract Specialist
Environmental Acquisition Branch
Procurement and Contract Division
U. S. DOE Oak Ridge Operations
P. O. Box 2001
Oak Ridge, Tennessee 37831-8758

Dear Mr. Million:

Attached please find Ohio's response to DOE comments on the Fernald and Mound AIP. Thanks for sharing your draft comments with us to allow for a quick response. Please contact me if you have any questions.

Sincerely,

Graham E. Mitchell
Chief, Office of Federal Facilities Oversight

GEM/bjc

- cc: Lydia Boada-Clista, USDOE-OH
- ~~Kathi Nickel, USDOE-Fernald~~
- Mike Reker, US DOE-Mound
- Pat Campbell, OEPA
- Tom Schneider, OEPA
- Brian Nickel, OEPA
- Ruth Vandegrift, ODH
- Allen Frederick, OEMA

RESPONSE TO DOE COMMENTS ON FERNALD AIP

1) Original Comment: The Cost Recovery Grant funding profile provides greater detail than the AIP funding profile. The AIP funding profile includes operating expenses which are not defined. The CRG contains no operating expenses, but provides detail on travel/training, and supplies. It would facilitate review if the grant profiles contained the same categories and level of detail. Please provide additional information regarding the Operating category.

Response: During initial negotiations of the AIP with DOE, Ohio was required to use one of two existing models (Oak Ridge or Idaho). These models predicated the use of the current format for the AIP. Ohio is open to changing this format or that of the Cost Recovery Grant for consistency during our upcoming renegotiation of both grants.

2) Original Comment: Page 5 maintenance/calibration/replacement of monitoring parts

A \$7,000 request for air monitoring related equipment is included, however, the type of equipment required is not clear.

Response: Expenses covered by this category include annual radon monitor calibration (\$2,400) as well as any needed monitoring equipment repair or updates. Air monitoring equipment that may be purchased under this category are Graesby Hi-Vols, Flow controllers, Pylon radon monitors and associated communications/data storage equipment for the radon monitors to update or replace current monitoring system components.

3) Original Comment: Page 6 Site installations as needed for environmental monitoring (air

and electrical services Last year the DOE set up an account with \$25,000 to assist Ohio EPA with the setup of air monitoring stations. Since the remaining air stations were on-site, FEMP personnel will do the work. The account was set up so that the FEMP could access the funds as necessary to establish the stations. It is not apparent that this funding is necessary under the AIP.

Response: Ohio EPA concurs that site installation costs should be eliminated since all proposed future locations are expected to be on Fernald property and with Fernald personnel doing utility hook-up work. Ohio EPA will continue to have costs associated with electrical service to monitors not powered by the site. Ohio EPA also has telecommunication costs associated with the radon monitors. These costs are estimated at \$4000 for SFY98. The grant should be revised to reflect these costs and the text revised to state that costs are associated with monitoring location utility requirements. An alternate suggestion would be to eliminate this category of funding and combine with the previous one (Comments 3&4) to create: "Air monitoring network - operation/maintenance/calibration/update" with funding at \$11,000.

4) Original Comment: Page 4 Lab analysis DOE is anticipating a sampling and analysis plan that describes the Ohio EPA sampling program. Without this plan it is difficult to evaluate the requested funding. However, the requested amount does not in general appear unreasonable for the expected amount of sampling. Please advise on when DOE can anticipate the S&A Plan.

Response: Ohio EPA has intended to revise our AIP Field Sampling Plan based upon the IEMP

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following its approval. As the IEMP is nearing completion, Ohio EPA is currently working on revision of the FSP. We expect to have a revised draft in late summer with implementation of the final FSP in calendar year 1998.

5) Original Comment: Page 4 Medical Monitoring The description includes radioassay services for tritium, et al. Tritium is not a FEMP contaminant. Perhaps this description was inadvertently copied from the Mound AIP.

Response: The comment is correct in that a typographical error occurred. The text should read "...for total uranium, et al...".

6) Original Comment: Page 12 RAD Analysis Both OFFO and ODH have requested funding laboratory analysis in the 5th year. Ohio EPA's response to a similar comment on last years funding profile was that ODH anticipated performing lab analysis in the fourth and fifth years. ODH requested about \$16,000 for lab related expenses in the fourth year and \$56,000 in the fifth year. Ohio EPA has requested \$75,000 in the fourth year and \$58,750 in the fifth year. Please clarify ODH's lab capabilities for the fourth and fifth years and clarify the types of analysis that will be the responsibility of ODH vs. Ohio EPA. Also why is it that in the fifth year when ODH appears to have expanded lab capability, which is assumed based on the increased funding request, the OEPA lab funding request remains relatively constant.

Response: ODH is in the process of upgrading their lab in order to analyze radiological samples. Currently, Ohio EPA is using a contract lab for this service and we expect this to continue through the fourth year. If ODH can complete their upgrade, meet QA/QC and other customer requirements, they may take on the task of analyzing radiological samples. There still would be an Ohio EPA laboratory component for any non-radiological analytical efforts. We will clarify all these issues when we submit the fifth year funding information during the spring of 1998.

7) Original Comment: Although one of the stated objectives of the OFFO is to participate in national dialogues and forums, no travel expenses have been requested. It is presumed that participate in via telephone and correspondence. If this is not the case travel expenses should be documented.

Response: Ohio EPA has and continues to participate in national dialogues and forums. Most travel costs for such trips are provided for by the sponsoring organization for the dialogue (e.g., CLN & ITRC travel are funded by EM-50). Any travel costs associated with the AIP that aren't covered by a sponsoring organization are included in the operating costs defined in the AIP.

8) Original Comment: Page 5 Intergraph The description states that the estimated cost of maintaining the Intergraph is \$3,386/ month, which equates to \$40,632/yr. The FEMP contribution is 75% or \$30,474. The CRG funding request includes \$11,634 and the AIP request

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is \$5,329 for the fourth year. The numbers do not appear to add to the total needed.

Response: Ohio EPA revised the Intergraph maintenance contract during SFY97 to incorporate new equipment and remove some older equipment in an attempt to reduce dollars committed to the maintenance agreement. This revision resulted in some confusion within the grant. The total maintenance contract costs are estimated to be \$23,000 for SFY98 based upon SFY97 costs and 5% escalation. Final cost will be defined in a purchase order with Intergraph in early SFY98. It is expected that costs for SFY99 will increase significantly as the server purchased in late SFY97 will come under the maintenance agreement in late SFY98.

Obviously the text within the grant is incorrect. The text should read the total estimated charge is \$23,000 with Fernald CRG/AIP paying 75% and the Mound CRG/AIP paying 25%.

RESPONSE TO DOE COMMENTS ON MOUND AIP

Ohio has listed the comments that asked for a response.

1d) Original Comment: Is there any other pertinent information which would be useful for cost analysis purposes? The funding profile specific to Mound does not match the funding profile provided by Ohio EPA for the DOE 10 year plan. In the DOE 10 year plan, dollars projected for AIP were: 1998 - \$776,367 and 1999 - \$779,670 versus what is submitted with this proposal of: 1998 - \$664,897 and 1999 - \$822,114. It is possible that the AIP funding profile difference may be different correlated to the award date and the State's fiscal year funding profile.

The 1999 funding profile is ~\$150K higher than the 1998 funding request. The primary difference is the contractual support for the Ohio Department of Health (ODH) RAD Analysis. There was not sufficient detail in the submittal to determine what additional scope was planned in 1999. If ODH has a monitoring plan for the Mound site, the plan should be submitted for review by MEMP.

Response: The differences in the 1999 funding profile (year 5) are mainly due to the lab issues. The Ohio Department of Health is in the process of upgrading their lab in order to analyze radiological samples. Currently Ohio EPA is using a contract lab for this service and we expect this to continue through the fourth year of the AIP. If ODH can complete their upgrade, meet QA/QC, and other program requirements, they may take on the task of analyzing radiological samples. There still would be an Ohio EPA laboratory component for any non-radiological analytical efforts. Ohio will clarify all these issues when we submit the fifth year funding information during the spring of 1998.

It is Ohio's goal to have only one state environmental monitoring plan (with input from ODH, OEMA, OEPA) for the Mound site and DOE Mound will have the opportunity to review any proposed changes in this plan.

2c(1) Is use of the proposed contractor(s) or subrecipient for a portion of the overall effort appropriate? (Why or why not?) Under the Ohio EPA, the Lab Analysis indicates that their sampling of the various media includes both non-RADs and Radionuclides. Under the ODH, while there is no detailed information listed, they are also focusing in on RAD monitoring. If both agencies have a monitoring plan, these plans should be submitted to assess any potential overlap or redundancies. Both agencies should be sharing sampling data with the other for the purposes of avoiding redundant costs.

Response: See Response above to comment 1d. Ohio will make every effort to avoid duplicative efforts and costs.

2(e) Other Direct Costs: Under Ohio Emergency Management Agency (OEMA) - Subsidies - more specific narrative is warranted as there is no detail for what is being provided for the \$15K .

Response: The Miami Valley EMA uses the subsidy for the following, but is not limited to, partial wages for staff (preparing hazards analysis, participating in drills, etc.), limited equipment (radios, monitoring equipment, etc.), and other activities directly related to the Mound facility.