



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FERNALD
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FEB 17 2000

REPLY TO THE ATTENTION OF SRF-5J

Mr. Johnny W. Reising
United States Department of Energy
Fernald Area Office
P.O. Box 398705
Cincinnati, Ohio 45239-8705

8104

Subject: U.S. EPA Review of "Revised Feasibility Study Report for Silos 1 and 2 Response to Comments," "Revised Feasibility Study Report for Silos 1 and 2," and "Revised Proposed Plan for Remedial Actions at Silos 1 and 2"

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the above-referenced documents as part of its oversight activities for Operable Unit 4 (OU4) at the United States Department of Energy (U.S. DOE) Fernald Environmental Management Project (FEMP). The documents, which are dated December 1999, were prepared by Flour Daniel Fernald for U.S. DOE. The response to comments document provides responses to U.S. EPA comments on the previous draft revised Feasibility Study (FS) report. The revised FS report and Proposed Plan (PP) address re-evaluation of the selected treatment remedy for OU4 Silo 1 and 2 materials.

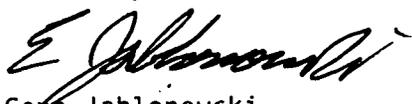
U.S. EPA found the documents to be generally acceptable, except how the disposal of debris from Silos 1 and 2 would be addressed. This issue was discussed in a meeting between U.S. DOE and the regulatory agencies held on February 8th, 2000. It was concluded that Silos 1 and 2 would undergo gross decontamination to remove visible Silos 1 and 2 material, with the debris appropriately size-reduced and packaged for off-site disposal. U.S. DOE stated that it would provide FS/PP change pages, addressing off-site disposal of Silo debris, to the regulatory agencies by March 1, 2000.

U.S. EPA is notifying U.S. DOE, pursuant to Section XII G of the 1991 Amended Consent Agreement, that formal comments, approval and/or disapproval of the draft revised OU4 FS/PP will not be submitted until March 31, 2000.

The draft OU4 revised FS/PP was sent to U.S. EPA on December 21, 1999. In accordance with Section XII G of the 1991 ACA, U.S. EPA must provide comments on such primary documents to U.S. DOE within sixty (60) days receipt of the primary document. U.S. EPA has submitted informal comments on the above-mentioned document via e-mail on February 15, 2000. However, as with previous FS/PP documents, U.S. EPA Region V must discuss this matter with U.S. EPA's National Remedy Review Board (NRRB) before any formal comments, approval or disapproval of the document can be submitted to U.S. DOE. A meeting with the NRRB is scheduled for the week of March 13th.

U.S. EPA anticipates submitting comments to U.S. DOE by March 31, 2000. Therefore, U.S. EPA is notifying U.S. DOE of this extension of time required to complete the review process of the draft revised OU4 FS/PP. Enclosed are U.S. EPA's draft informal comments. Please contact me at (312) 886-4591 if you have any questions.

Sincerely,



Gene Jablonowski
Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Bill Murphie, U.S. DOE-HDQ
John Bradburne, Fluor Fernald
Terry Hagen, Fluor Fernald
Tim Poff, Fluor Fernald

ENCLOSURE

TECHNICAL REVIEW COMMENTS ON
"REVISED FEASIBILITY STUDY REPORT FOR SILOS 1 AND 2"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

(Two Pages)

TECHNICAL REVIEW COMMENTS ON
"REVISED FEASIBILITY STUDY REPORT FOR SILOS 1 AND 2"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENT

Commenting Organization: U.S. EPA
Section #: Not Applicable (NA) Page #: NA
Original General Comment #: 1

Commentor: Jablonowski
Line #: NA

Comment: Several abbreviations and acronyms used in the report, especially those in Section 3, are not included in the acronym list or are defined incorrectly in the list. For example, Table 3.1-3 uses the following abbreviations and acronyms that are not in the acronym list: yd³ (cubic yard), psi (pound per square inch), ppb (part per billion), and TRU. Other acronyms missing from the list include IHA (integrated hazard analysis) in Section 3.2.6.2 on page 3-82 and the following acronyms in Figures 3.2-3, 3.3-3, 3.4-2, and 3.5-2: FF, HQ (headquarters), and FHAR (final hazard analysis report). Acronyms defined incorrectly in the list include FR, which is defined as "federal regulation" instead of "Federal Register." The entire report should be checked, and all abbreviations and acronyms used in the text, tables, and figures should be correctly defined in the acronym list.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA
Section #: 1.3.2.1 Page #: 1-12
Original Specific Comment #: 1

Commentor: Jablonowski
Line #: 12

Comment: The text describes "Silo 4 (empty)" as a component of Operable Unit 4. However, to be consistent with page ES-2 of the executive summary, the parenthetical description should be revised to read "(empty except for rainwater)."

Commenting Organization: U.S. EPA
Figure #: 3.4-1 Page #: 3-129
Original Specific Comment #: 2

Commentor: Jablonowski
Line #: NA

Comment: The figure presents a simplified process diagram for the chemical stabilization - cement-based alternative. However, two arrows are unlabeled. The unlabeled arrow at the slurry tank should be labeled "Recycle to TTA," and the second unlabeled arrow should be labeled "Gas to RCS." The figure should be revised to incorporate these changes.

Commenting Organization: U.S. EPA
Figure #: 3.5-1 Page #: 3-156
Original Specific Comment #: 3

Commentor: Jablonowski
Line #: NA

Comment: The figure presents a simplified process diagram for the chemical stabilization - other alternative. To be consistent with the text and other figures, an arrow should be added at the slurry tank and

