



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich
Governor

May 4, 2000

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

Re: SILOS 1 & 2 PROPOSED PLAN PUBLIC COMMENTS

Dear Mr. Stegner:

This letter provides Ohio EPA's public comments on the Operable Unit 4 Silos 1 & 2 Proposed Plan.

1. The OU4 Silos 1 & 2 Proposed Plan is the culmination of efforts by U.S. DOE, Ohio EPA, and U.S. EPA to understand and develop a plan for treating and disposing of the K-65 silos and their contents. Ohio EPA believes the alternative selected in the Proposed Plan is protective of human health and the environment. Ohio EPA supports the preferred alternative of chemical stabilization for the K-65 wastes. The preferred alternative is more implementable and will result in substantially less secondary wastes. Of significant importance to Ohio EPA during considering the alternatives is the release of radon gas during treatment. Ohio EPA believes the preferred alternative provides a substantial reduction in air pollution releases and increased reliability of emissions controls over the other alternative considered.
2. DOE should commit to including and/or developing real-time monitoring for discharges to the environment resulting from remedial actions. DOE should attempt to incorporate any new developments in real-time monitoring from the DOE Office of Science & Technology as well as the private sector. Data obtained from real-time monitors and any additional monitoring activities should be provided to the Ohio EPA and public in a timely manner.
3. DOE should attempt to incorporate pollution prevention activities whenever possible during the design and operation of the Silos 1 & 2 remedial action systems, including using this as a criterion in selection of a contractor. All available methods to reduce or eliminate discharges and releases should be considered during the design of the system. The consideration of reducing decontamination and

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demolition volumes and costs should be a part of the contractor selection and design activities.

4. DOE must ensure the public that their involvement will not be diminished during Remedial Design and Remedial Action (RD/RA). DOE should commit within the Record of Decision for OU4 Silos 1 & 2 to maintaining the exceptional on-going public involvement program during RD/RA.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,



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

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Francie Hodge, Tetra Tech EM Inc.
Ruth Vandergrift, ODH