



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street TELE: (937) 285-6357 FAX: (937) 285-6404 Bob Taft, Governor
Dayton, Ohio 45402-2911 Maureen O'Connor, Lt. Governor
Christopher Jones, Director

July 2, 2002

Mr. Johnny Reising
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, OH 45329-8705

Handwritten notes: FERNALD LOG C-1478, 2002 JUL -3 A 11:50, FILE:

RE: COMMENTS - DRAFT ESD FOR OU1

Dear Mr. Reising:

Ohio EPA has reviewed DOE's April 29, 2002 submittal, "Transmittal of the Draft Explanation of Differences for Operable Unit 1." Ohio EPA's comments follow:

1. Commenting Organization: OEPA Commentor: OFFO

Section #: Line #: Code: C

Comment: Ohio EPA understands that DOE no longer intends to manage the enriched uranium through the Operable Unit 1 facilities. Treatment of this material within the OU1 operation appears to be the major driver for this ESD. Additional justification for the ESD is necessary in light of DOE's change in management plans for the enriched uranium.

2. Commenting Organization: OEPA Commentor: OFFO

Section #: Line #: Code: C

Comment: The ESD does not sufficiently limit or provide checkpoints for managing materials through OU1. Additional details should be provided on a mechanism for case or waste stream specific agency approvals for managing non-OU1 waste streams through OU1 facilities. This step is especially important considering DOE's prior proposal to manage enriched uranium through OU1 thus requiring the construction of a new facility and additional safety procedures.

3. Commenting Organization: OEPA Commentor: OFFO

Section #: Line #: Code: C

Comment: The document should provide more details regarding potential waste streams that would be managed through OU1 facilities. The current description is insufficiently detailed to allow the public a clear understanding of the proposed changes

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to the existing Record of Decision.

If there are 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, Fluor Daniel Fernald
Mary Wojceichowski, Tetrattech
Ruth Vandegrift, ODH
Mark Schupe, HSI Geotrans