

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT EXPLANATION OF SIGNIFICANT DIFFERENCES FOR
OPERABLE UNIT 1

8199

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENTS

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 1.2

Page #: 2

Line #: NA

Original General Comment #: 1

Comment: In the first sentence – Replace “Fernald Environmental Management Project (FEMP) in Fernald, Ohio” with “FEMP”. Section 1.1 already establishes “FEMP” as an acronym for the “Fernald Environmental Management Project” and sets forth the site location.

Response: Agreed

Action: The text has been revised accordingly.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 1.2

Page #: 2

Line #: NA

Original General Comment #: 2

Comment: Delete the second sentence. Again, Section 1.1 already sets forth this information.

Response: Agreed.

Action: The text has been revised accordingly, although the corresponding sentence in Section 1.1 has been revised to identify the signatories to the ROD.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 1.3

Page #: 2

Line #: NA

Original General Comment #: 3

Comment: Revise the third sentence as follows: “DOE and both the US and Ohio EPAs agree that the change contemplated by this document is significant but not fundamental because it does not change cleanup levels or the basic remedy of removal, safe transportation, and offsite disposal of the OU1 waste streams. In addition, the change will not increase costs and may even lead to significant cost and time savings.”

Response: Agreed.

Action: The text has been revised accordingly.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 1.4

Page #: 3

Line #: NA

Original General Comment #: 4

Comment: In the first sentence insert "the" after "at" and before "Public".

Response: Agreed.

Action: The text has been revised accordingly.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 2.0

Page #: 3

Line #: NA

Original General Comment #: 5

Comment: In the second paragraph, second sentence replace "with" with "within".

Response: Agreed.

Action: The text has been revised accordingly.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 2.0

Page #: 4

Line #: NA

Original General Comment #: 6

Comment: In the fifth paragraph, first sentence replace "This remedy" with "The remedy described in the OU1 ROD".

Response: Agreed.

Action: The text has been revised accordingly.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 2.0

Page #: 4

Line #: NA

Original General Comment #: 7

Comment: In the fifth paragraph, fourth sentence add "nor increase costs" to the end of this sentence.

Response: Agreed.

Action: The text has been revised accordingly.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.0

Page #: 4

Line #: NA

Original General Comment #: 8

Comment: In the second paragraph, second sentence – delete the comma following the close parenthesis.

Response: Agreed.

Action: The text has been revised accordingly.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.0

Page #: 4

Line #: NA

Original General Comment #: 9

Comment: In the third paragraph, first sentence insert "(OSDF)" after "Facility" and before "would".

Response: Agreed.

Action: The text has been revised accordingly.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.0

Page #: 4

Line #: NA

Original General Comment #: 10

Comment: In the third paragraph, second sentence delete "FEMP's On-Site Disposal Facility" and remove the parenthesis around "OSDF".

Response: Agreed.

Action: The text has been revised accordingly.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.0

Page #: 5

Line #: NA

Original General Comment #: 11

Comment: In the third paragraph, fourth sentence insert "OU 5" after "of" and before "soil".

Response: Agreed.

Action: The text has been revised accordingly.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.0

Page #: 5

Line #: NA

Original General Comment #: 12

Comment: In the fourth paragraph, fourth sentence explain how processing additional FEMP waste through the OU 1 remediation facility may be a significant element of the OU 1 remediation process.

Response: Agreed.

Action: The following sentence has been added to the subject paragraph providing an example of how processing additional FEMP waste through the OU1 remediation facility may be considered significant: "Processing the additional FEMP waste through the OU1 remediation facility may be considered significant, because it may be necessary to add substantial facilities/equipment to pre-treat this material in order to support processing through the existing facility."

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.0

Page #: 5

Line #: NA

Original General Comment #: 13

Comment: In the fifth paragraph, second sentence in lieu of "low level" insert a number or reference some other objective standard for limiting the radiological concentration in these other waste streams. The criteria could be listed in bullet form.

Response: Agreed.

Action: The text has been revised to incorporate the general requirements for considering other wastes to be processed through OU1.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.0

Page #: 5

Line #: NA

Original General Comment #: 14

Comment: In the fifth paragraph, fifth sentence this should be a new paragraph and be revised to read "The OU 5 and 2000 containers of enriched uranium waste are discussed herein as examples."

Response: DOE agrees with the intent of this comment, relative to clarifying the discussion in the subject paragraph. After reviewing the subject sentence, however, it was determined that it would be more appropriate to simply delete this sentence, and then begin a new paragraph starting with the next sentence.

Action: The subject sentence has been deleted, and the subject paragraph has been split into two paragraphs.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.0

Page #: 5

Line #: NA

Original General Comment #: 15

Comment: In the fifth paragraph, revise the sixth sentence as follows: "However, any FEMP waste stream that meets the criteria listed above may be managed in the OU 1 remediation facility."

Response: Agreed.

Action: The text has been revised, although modified slightly to reflect the deletion of the preceding sentence (see response to General Comment #15).

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.0

Page #: 5

Line #: NA

Original General Comment #: 16

Comment: In the sixth paragraph, third sentence insert "Federal and State" after "the" and before "EPAs".

Response: Agreed.

Action: The text has been revised accordingly.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.0

Page #: 5

Line #: NA

Original General Comment #: 17

Comment: In the sixth paragraph at the end of the last sentence include ", and provide any documentation requested by the EPAs."

Response: Agreed.

Action: The text has been revised accordingly.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 5.0

Page #: 6

Line #: NA

Original General Comment #: 18

Comment: Describe the publication of a notice regarding the ESD in a major local newspaper as is required by 40 CFR 300.435 (c) (2) (i) (B) (or at least state the intention to do so).

Response: Agreed.

Action: The text has been revised accordingly. In addition, this section has been revised to include a reference to the discussion of this ESD at the February 12, 2002 Fernald Cleanup Progress Briefing.