

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

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

Commenting Organization: OEPA

Commentor: OFFO

Section #:

Line #:

Code: C

Original General Comment #: 1

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 the management plans for the enriched uranium.

Response: Although a majority of the enriched uranium waste will no longer be managed through the OU1 remediation facility, approximately 600 containers of this waste will still be managed through the facility. Specifically, under the current plan, the enriched, restricted uranium waste (which represents about three-fourths of the original inventory) will not be managed through the OU1 remediation facility. DOE still plans, however, on managing the enriched, non-restricted uranium wastes through the OU1 remediation facility.

Although the issuance of the ESD may have been triggered by the plan to manage this enriched uranium waste through the OU1 remediation facility, the ESD itself was to address the larger population of "other FEMP waste streams" which have been, and are planned to be, processed through the OU1 remediation facility. Specifically, this ESD describes the rationale as to why management of any of these waste streams through the OU1 remediation facility is advantageous. In addition, the ESD details how the management of these waste streams, although resulting in a significant change to the selected remedy, does not fundamentally change the cleanup levels or the basic remedy spelled out in the OU1 Record of Decision. The ESD thereby provides the mechanism for formally including the processing of the "other FEMP waste streams" through the OU1 remediation facility, as a component of the plan for the remediation of OU1.

Action: Section 3.0 has been revised to reflect the anticipated processing of only 600 containers of enriched, non-restricted uranium waste. It is DOE's opinion that the ESD otherwise adequately addresses the applicability of, and the need for, this ESD to formally include the processing of these "other FEMP waste streams" through the OU1 remediation facility.

Commenting Organization: OEPA

Commentor: OFFO

Section #:

Line #:

Code: C

Original General Comment #: 2

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 features.

Response: DOE agrees that the clearer definition is needed, and the ESD has been revised to incorporate requirements for considering other waste to be processed through WPRAP. By meeting these requirements, DOE will be able to ensure that a waste stream can be managed through the OU1 facility, without adversely impacting the OU1 remediation process (i.e., while preserving the basic elements of the plan for the remediation of OU1). As stated in the ESD, "DOE will project in advance for EPA concurrence, non-OU1 wastes to be managed with this ESD". In addition, where the management of a waste stream requires substantive changes to EPA-approved documents, the ESD also states that information in support of these changes would be provided to the EPAs for review and concurrence.

Action: Section 3 has been revised to incorporate general requirements for considering other waste streams to be processed through OU1.

Commenting Organization: OEPA

Commentor: OFFO

Section #:

Line #:

Code: C

Original General Comment #: 3

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 to the existing Record of Decision.

Response: Most of the potential waste streams to be managed through the OU1 remediation facility will be similar to those already managed through OU1. Specifically, over two-thirds of those wastes anticipated to be managed through OU1, are OU5 soils which do not meet the WAC for the OSDF. The remaining projected quantity consists of containerized wastes, similar to those previously dumped on Soil Pile 7, and then transferred to OU1, as well as debris. The text will be revised to make this clearer.

Action: Section 3 has been revised to provide examples of the "soil-like material", and to clarify that some of these same waste streams will make up much of the remaining projected quantity of waste streams to be processed through OU1.