



Department of Energy

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JUL 16 1998

DOE-1011-98

Mr. Thomas Schneider
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, OH 45402

Dear Mr. Schneider:

**OPERABLE UNIT 1 TRANSPORTATION AND DISPOSAL PLAN - TRANSMITTAL OF
RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS**

This letter transmits the Department of Energy's (DOE) responses to the Ohio Environmental Protection Agency (OEPA) comments received June 18, 1998, on the Transportation and Disposal Plan for Operable Unit 1 (OU1).

On June 30, 1998, DOE awarded a commercial low level waste disposal contract to Envirocare of Utah, Inc. A revised OU1 Transportation and Disposal Plan, incorporating these comments and the U.S. Environmental Protection Agency (U.S. EPA) comments will be submitted to the U.S. EPA and OEPA by July 31, 1998.

If you have any questions, please contact Dave Lojek at 513-648-3127.

Sincerely,

Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Lojek

Enclosure: As Stated

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cc w/enc:

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Commenting Organization: Ohio EPA
Section#: General Comment Page#: NA
Original Comment #: 2

Commentor: OFFO
Line#: NA
Code:

Comment: This plan is designated a transportation and disposal plan but offers very little regarding disposal. The plan should be developed further to include the disposal location, travel routes including any stop over locations, estimated time en route, and radiological emergency response contacts along the transportation route.

Response: Agree. Since a contract for the PCDF has been awarded to Envirocare, the disposal location and travel routes have been incorporated into the plan. The estimated turnaround time required at Envirocare is approximately four days. The Tender with the participating railroad companies is currently being negotiated. Accordingly, specific details have not yet been finalized.

Action: The Transportation and Disposal Plan has been revised to include the disposal location as Envirocare. Additionally, travel routes and approximate travel times en route have also been incorporated into the plan. The Emergency Response section has been updated to include a reference to procedure EM-0034, Transportation Emergency Recovery Team, which provides guidelines for the activation of the Transportation Emergency Recovery Team and establishes a controlled system for the response and management of an off-site transportation response scenario for the FEMP.

Commenting Organization: Ohio EPA
Section#: General Comment Page#: NA
Original Comment #: 3

Commentor: OFFO
Line#: NA
Code:

Comment: To the extent possible, the transportation and disposal plan should include a contingency plan in the event that a railcar were rejected at the disposal facility. Would it have to return to Fernald or could it be further characterized and possibly rerouted from the disposal facility?

Response: Comment Acknowledged. Upon receipt of the railcars from the railroad, Envirocare personnel will inspect, sample, and analyze each waste shipment to confirm that the material is within the range established by the pre-shipment analysis. In the event that any waste arriving at the disposal facility does not conform to the accepted waste profile, the waste material will not be unloaded. DOE will be notified immediately and a corrective action plan will be developed in accordance with Envirocare's Waste Characterization Plan. At Envirocare's option, the non-conforming shipment may either be returned to the FEMP or managed in accordance with its Low Activity Radioactive Waste, Waste Management Plan. Envirocare has the capability on site to provide supplemental treatment to non-compliant waste. While supplemental treatment would incur additional charges to DOE, the

return of railcars loaded with non-complying waste is considered to be highly improbable.

Action: DOE has included the above information to the plan in an additional section entitled Receipt of Waste at Envirocare.

Commenting Organization: Ohio EPA
 Section#: 2.5.1
 Original Comment #: 4

Page#: 2-5

Commentor: OFFO
 Line#: NA
 Code: C

Comment: What is the future of the gondola cars after the completion of the transportation of OU1 wastes?

Response: Comment Acknowledged. The project is expected to use less than 25% of the estimated life of the gondola cars. Once this project is completed, the railcars will be made available in the Defense Reutilization Marketing Service. Other DOE facilities will have the first opportunity to procure these cars through the Government Excess Surplus Program. If there is no need within the DOE complex, the cars will then be offered to other government agencies, states, municipalities, and eventually the public.

Action: No action required.

Commenting Organization: Ohio EPA
 Section#: 2.5.1
 Original Comment #: 5

Page#: 2-5

Commentor: OFFO
 Line#: NA
 Code: C

Comment: The text states that a procedure will be developed for assembling the unit train paperwork package. In what document will this procedure be included?

Response: Comment Acknowledged. Standard Operating Procedures (SOPs) will be developed consistent with commitments contained in the Transportation & Disposal Plan, and as the project progresses, will be regularly reviewed and updated as appropriate. The SOPs will not be included in any specific document; rather, they will be issued internally as/when necessary to support operations, including training.

Action: No action required.

Commenting Organization: Ohio EPA
 Section#: 2.5.2
 Original Comment #: 6

Page#: 2-6

Commentor: OFFO
 Line#: NA
 Code: C

Comment: OEPA strongly recommends that DOE incorporate lessons learned from the waste shipment leak in Kingman, Arizona into the transportation plan for OU1 wastes. One of the logistical lessons learned resulted in the need for a more comprehensive plan in deploying support teams when an incident has occurred away from the site. This plan should be in place prior to any OU1 waste shipments as well as any shipments from the site utilizing other modes of transportation.

Response: Comment Acknowledged. Effective 4-01-98, the FEMP issued procedure EM-0034, Transportation Emergency Recovery Team, which provides guidelines for the activation of the Transportation Emergency Recovery Team. This procedure establishes a controlled system for the response and management of an off-site transportation response scenario for the FEMP.

Additionally, project personnel will actively participate in a "Lessons Learned Program " in accordance with WPRAP Standing Orders.

Action: Section 6.0, Emergency Response, has been revised to include the reference to EM-0034, Transportation Emergency Recovery Team.

Commenting Organization: Ohio EPA
 Section#: 4.3.1
 Original Comment #: 7

Page#: 4-2

Commentor: OFFO
 Line#: NA
 Code: C

Comment: The text states that pre-operational inspections will include the monitoring of sand. Please explain the role of sand in the operation of the locomotives.

Response: Comment Acknowledged. Sand is used for increasing the traction of the locomotives when the rails become wet or slick. The locomotive will dispense sand on the rails to allow the locomotive to re-establish tractive capabilities. The text actually uses the word "Checking" as opposed to "Monitoring". Checking the sand simply entails verifying that there is a sufficient amount of sand and that it is dry enough to properly dispense.

Action: No action required.

Commenting Organization: Ohio EPA
 Section#: 4.3.2 Page#: 4-2
 Original Comment #: 8

Commentor: OFFO
 Line#: NA
 Code" C

Comment: Please describe what contingency plans DOE has in place in case of a malfunction of a gondola railcar or locomotive while en route to the disposal facility.

Response: Comment Acknowledged. As stated in Section 2.5.2 Railroad Requirements, "Any bad order car identified en route will be the responsibility of the railroad company in possession of the car at the time it is discovered. If the car can be moved, maintenance will be performed in a repair shop accepted by the railroad, per 49 CFR 215.9. If the car cannot be safely moved to a repair facility, a mobile repair crew will be dispatched to the car location. The railroad company will notify the FEMP of any bad order cars identified en route and consult on the repairs made to the cars." All repairs will be as made quickly as possible. If repairs are of a minor nature, the entire Unit train will be held while the repairs are made. Major repairs may require that the car be removed and the balance of the train will continue on. After repairs are made, the car will be placed back into manifested service by the handling railroad in the same direction of travel, and to the same destination as the original train. During repairs, the car lids will not be removed nor will the contents be unloaded without the presence of a DOE representative.

Action: Section 2.5.2 has been revised to include the following information:
 "All repairs will be as made quickly as possible. If repairs are of a minor nature, the entire Unit train will be held while the repairs are made. Major repairs may require that the car be removed and the balance of the train will continue on. After repairs are made, the car will be placed back into manifested service by the handling railroad in the same direction of travel, and to the same destination as the original train. During repairs, the car lids will not be removed nor will the contents be unloaded without the presence of a DOE representative."

Commenting Organization: Ohio EPA
 Section#: 7.4.2 Page#: 7-2
 Original Comment #: 9

Commentor: OFFO
 Line#: NA
 Code" C

Comment: OEPA recommends that an additional operational scale model of the size rail infrastructure be made available at stakeholder meetings. This working model will be an excellent communications tool in explaining the loading and transportation process.

Response: Comment Acknowledged. The scale model of the rail infrastructure was designed to acclimate Rail Operations personnel to the project and for use as a tool by Operations Planning for Rail System development. DOE's original

intent was to make the scale model available for display at public meetings. However, the model is not easily transported and set up. The existing model will be made available at the site for public display whenever feasible.

Action: No action required.