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TRANSMITTAL OF RESPONSE TO COMMENTS DOCUMENT FOR THE OPERABLE UNIT 1 REMEDIAL DESIGN, PRELIMINARY DESIGN SUBMITTAL

01/19/96

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DOE-FN EPAS
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RESPONSES

Department of Energy
Fernald Environmental Management Project
P. O. Box 398705
Cincinnati, Ohio 45239-8705
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JAN 1 9 1996

DOE-0427-96

Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V - SRF-5J
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, OH 45402-2911

Dear Mr. Saric and Mr. Schneider:

TRANSMITTAL OF RESPONSE TO COMMENTS DOCUMENT FOR THE OPERABLE UNIT 1 REMEDIAL DESIGN, PRELIMINARY DESIGN SUBMITTAL

The purpose of this letter is to transmit the Department of Energy, Fernald Area Office (DOE-FN) Response to Comments Document (RTC) for Operable Unit 1 (OU1) Remedial Design, Preliminary Design submittal. The RTC formally responds to both the U. S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) comments on the OU1 Preliminary Design.

The OU1 Remedial Design, Preliminary Design submittal was disapproved with comments by the U.S. EPA on December 15, 1995. The OEPA comments on the OU1 Remedial Design, Preliminary Design were received by DOE-FN on December 27, 1995. Subsequently, the submittal of a combined RTC document responding to both the U.S. EPA and OEPA comments was agreed to be submitted on January 22, 1996.

The OU1 Pre-Final Design, scheduled to be submitted on March 21, 1996, will include necessary revisions incorporating the comments responses. If you have any questions with regard to this item, please contact Dave Lojek at (513)-648-3127.

Sincerely,

Johnny Reising

Johnny Reising
Fernald Remedial Action
Project Manager

FN:Lojek

Enclosure: As Stated

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Recycled and Recyclable

cc w/enc:

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RESPONSE TO USEPA AND OHIO EPA COMMENTS

OPERABLE UNIT 1 REMEDIAL DESIGN PRELIMINARY DESIGN PACKAGES I AND II, OCTOBER 1995

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
FERNALD, OHIO

REMEDIAL DESIGN

JANUARY 1996

U.S. DEPARTMENT OF ENERGY
FERNALD AREA OFFICE

203

RESPONSE TO USEPA AND OHIO EPA COMMENTS

OPERABLE UNIT 1 REMEDIAL DESIGN PRELIMINARY DESIGN PACKAGES I AND II, OCTOBER 1995

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
FERNALD, OHIO

REMEDIAL DESIGN

JANUARY 1996

U.S. DEPARTMENT OF ENERGY
FERNALD AREA OFFICE

000004

RESPONSE TO USEPA COMMENTS ON THE OU1 REMEDIAL DESIGN PRELIMINARY DESIGN PACKAGES, I AND II

GENERAL COMMENTS

Materials Management Plan

1) Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA

Comment: The materials management plan provides a strategy for handling all of the material removed from operable unit 1 (OU1), both material that will be sent to an off-site disposal facility and to the on-site disposal cell. The handling of the material to be sent from OU1 to the on-site disposal cell will be coordinated along with the movement of material from other OUs that will be placed in the on-site disposal cell. Interim storage of OU1 material and the coordination of its transport with other OUs should be provided in the materials management plan.

Response: Agree. Activities associated with the transfer, storage, and placement of any OU1 soils in the on-site disposal facility (OSDF) will be coordinated with those from other FEMP remediation projects, first under the guidance of Revision 3 of the Removal Action 17 (RA17) Work Plan, and then under the guidance of remedial planning documents developed through the Soil Remediation Project. The only OU1 soils which would most likely be handled under Rev. 3 of the RA17 Work Plan are soils removed during initial site preparation activities. In accordance with Rev. 3 of the RA17 Work Plan, these OU1 soils will be managed with soils from other projects destined for on-property disposal, including potential management in a single central staging area.

Once the Soil Remediation Project remedial planning documents are approved relative to material handling for the OSDF, any subsequent OU1 activities which result in the generation of soils which can be placed into the on-site facility will be performed in a coordinated site-wide manner in accordance with these documents. Within the OU1 remediation facilities, various storage piles have been identified for soils, representing feed piles in support of treatment and blending, primarily for eventual loading into railcars for shipment for off-site disposal. Those OU1 soils destined for the OSDF will be segregated and managed in one of these areas, as necessary, to effect a coordinated transfer to the Soil Remediation Project for placement in the OSDF.

As discussed in the response to Ohio EPA Comment #25, no efforts will be made to place any debris from the OU1 waste pit processing activities in the OSDF.

Action: The Materials Management Plan is being revised to ensure that discussions therein reflect this coordinated site-wide effort on the handling of soils destined for placement in the OSDF. This revision will be provided with the March 21, 1996, Pre-final Design Packages. It is important to note, however, that in order to continue to be effective as a planning tool, the Materials Management Plan most probably will require further updating beyond that submittal (e.g., to reflect the specifics of the Soil Remediation Project remedial planning documents).

Excavation Plan

2) Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA
Comment: The excavation plan contains many assumptions, which at times are conflicting and confusing. Each time a design assumption is made on the basis of available data and a specific action is planned, a contingency is provided for by stating that if the planned action does not work, then other actions may become necessary and will be decided or designed later.

It is recognized that the overall excavation plan is complicated and all contingencies cannot be addressed; however, the plan appears to rely on many actions that will be designed later, and does not provide adequate alternatives. The main concern with this approach is that significant delays may occur in implementing the remedial action when new alternatives need to be designed.

Response: Comment Acknowledged. Due to the heterogeneity of the waste pits and based on the lessons learned from the DEEP project, maintaining a fixed schedule for the implementation of a defined mining plan could be accompanied by opportunities for delay resulting from the possibility of changed field conditions. The Excavation Plan identifies potential concerns and identifies field responses when such difficulties arise.

As presented in the Excavation Plan, primary reliance is placed upon conventional excavation equipment to conduct the excavation. Upon encounter of an area within the pits where the use of conventional equipment is infeasible, the excavation would shift to another area within the same pit or to another pit in order to continue the overall excavation. As a contingency, excavation of the waste pits by slurrying is also presented.

If, based on experience in conducting excavation, a significant portion of one or more pits is ascertained to be excavable only through slurry pumping, this equipment will be procured and installed. The pre-final design for the OU1 plant includes space for the future installation of slurry handling equipment.

However, given the current state of knowledge of the OU1 waste, there would be a very low probability of incurring a significant delay in the excavation due to the lack of alternative opportunities within the same pit or of another pit, for the application of conventional excavation.

Action: The Excavation Plan will be revised for the Pre-final Design Packages to clarify the excavation techniques to be used and when they will be implemented. It will also emphasize that the planned excavation will allow for prompt changes to be implemented without the need to stop excavation and redesign.

3) Commenting Organization: U.S. EPA Commentor: Saric
Section #: 1-1 Page #: 1-1 Line #: 16 and 17
Comment: The text states that "equipment operations are not planned or anticipated to occur on pit wastes." It further states that "operations will be from on top of pit caps, on the pit bottoms..." These statements need further clarification. It does not seem possible that pits can be excavated without operations being conducted on top of or in the pit.

Response: Comment Acknowledged. DOE is currently planning to excavate the waste pits with mechanical excavation equipment located in two areas; the waste pit cover and the waste pit liner. At each of these points, the cover and the liner, a long reach backhoe will be utilized to remove waste from the waste excavation face. This technique is referred to as the "top and bottom" excavation approach mentioned in the Excavation Plan; with the "top" being cover material, not pit wastes; and the "bottom" being the waste pit liner not pit wastes. This approach was devised to eliminate the need for the operators to drive on waste of unknown strength, thereby eliminating safety concerns for the mechanical equipment operators.

Action: The Excavation Plan will be revised for the Pre-final Design Packages to better describe the "top and bottom" approach for excavating pit wastes.

4) Commenting Organization: U.S. EPA Commentor: Saric
Section #: 1-2 Page #: 1-1 Line #: 25 through 38

Comment: The text states that the excavation to be conducted in Pits 1, 2, 4, and in the Burn Pit will be similar to that conducted in Pit 3. This statement appears to be contradictory because Pit 3 is a wet pit, which will most likely require hydraulic excavation. Pits 1, 2, 4, and the Burn Pit are dry pits and mechanical excavation is planned for the dry pits. This apparent contradiction should be resolved and the text revised accordingly.

Response: Comment Acknowledged. All of the waste pits (including Waste Pits 3 and 5) are currently planned to be excavated with mechanical equipment. If attempts to mechanically excavate wastes are unsuccessful, slurrying the wastes will be undertaken. This should allow excavation to proceed with no excavation down time.

Action: The Excavation Plan will be revised for the Pre-final Design Packages, to clarify, as necessary, that the current plan is to mechanically excavate all pit waste.

5) Commenting Organization: U.S. EPA Commentor: Saric
Conceptual Drawings Drawings No.: 91X-5900-G-00133 and 91X-5900-G-0015A
Section #: NA Page #: NA Line #: NA

Comment: Activities for plan phases 1, 2, 3, and 4 are shown in Drawing 00133, which relates to Pits 1, 2, and 3. These phases contradict the activities for phases 1 and 2 shown in Drawing 0015A, which relates to Pits 5 and 6. This apparent contradiction should be resolved by correctly renumbering the phases.

Response: Comment Acknowledged. The phases shown on Drawing 00133 are specific to excavation activities planned for Pits 1, 2, and 3, with a description of these phases provided in Section 5.2.1 of the Excavation Plan. Similarly, the phases shown on Drawing 0015A are specific to activities planned for Pits 5 and 6. There is no direct relationship between these phases (e.g., Phase 1 for Pits 1, 2, and 3 and Phase I for Pits 5 and 6), rather it is merely reflective of the use of the same nomenclature.

Action: Section 5.2.2 will be revised for the Pre-final Design Packages to reflect a referencing of the sequence discussion with the phases reflected on Drawing 0015A.

Specifications

6) Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA
Comment: The specifications for the dryer and shredder are presented in different formats and will require the bid evaluations of these major items of equipment to be carried out differently. The dryer specification is a typical performance specification. U.S. EPA recommends that the shredder specification also be written as a performance specification.

Response: Comment Acknowledged. The heterogeneous nature of the waste material requires a wide degree of flexibility, so a strict duty or performance specification format describing the desired performance was selected for procurement of the shredder. Minimum essential requirements are stated in Section 2.1 and 2.2. The specification has refrained from being too detailed in order to allow different bidders to bid their standard equipment. It was expected that a more specific definition was required for dryer fabrication and a more detailed specification was written.

Action: No additional action required.

SPECIFIC COMMENTS

7) Commenting Organization: U.S. EPA Commentor: Saric
Section #: 13652 Page #: 4 of 23 Line #: 20 through 23
Comment: The text should specify the type of sensors to be used and how the fire suppression system will be activated. The text also should specify if the system is to be activated automatically or manually.

Response: Agree. At this time, the type of sensor and fire suppression system to be used is not yet fully developed.

Action: The Pre-final Design Packages will address these questions in detail.

8) Commenting Organization: U.S. EPA Commentor: Saric
Section #: 13652 Page #: 5 of 23 Line #: 8 through 10
Comment: A manufacturer cannot design instrumentation and controls for the shredder when details about the system operation are not specified. The text should be revised to include this information.

Response: Agree. The debris shredder will be used to process large debris greater than 12 inches in any dimension. The process shredder system will be used to size reduce all waste and debris (less than 12

inches size) to a 4 inch size in any direction to provide feed for the dryer. These systems will be stand alone with both local and remote controls and instrumentation. Both shredders will be interlocked with the rest of the material handling system for starting, stopping, and emergency alarms. The minimum requirements for the instrumentation and control system are sufficiently described in Section 2.1.F, Page 15 of 23, of the new shredder specification.

Action: The specification has been clarified. Two shredder systems will be provided in the Pre-final Design Package Specification.

9) Commenting Organization: U.S. EPA Commentor: Saric
Section #: 13652 Page #: 5 of 23 Line #: 14 through 19
Comment: If the bids for the shredder will be evaluated based on price (that is, low bid), then manufacturers will not volunteer additional "optional equipment" because it will increase their bids. The specifications should therefore clearly specify all minimum requirements, accessories, and auxiliary equipment, as required. All these minimum requirements should be specified so that all bidders are consistently providing bids on the same items.

Response: Agree. The specification has been revised to clarify minimum requirements. Also, the shredders will not be evaluated on price alone. A technical evaluation plan and a technical evaluation method for both the shredder systems has been prepared. The evaluation shall include technical as well as commercial assessment of bids. The successful bidder will be selected based on the results of both of these evaluations. Bidders will be encouraged to offer alternate proposals, provided they also submit a proposal meeting the minimum requirements.

This specification has been written as a performance specification to allow flexibility to the bidders to meet a certain performance criteria. The minimum essential requirements are stated in Sections 2.1 and 2.2.

Action: The revised shredder specification will be included with the Pre-final Design Packages.

10) Commenting Organization: U.S. EPA Commentor: Saric
Section #: 13652 Page #: 9 of 23 Line #: 22 and 23
Comment: In addition to conducting shop testing, a field test should also be performed. The field test will evaluate the efficiency of the machine in the field on the actual material to be processed. This testing will demonstrate the field reliability of the shredder.

Response: Comment Acknowledged. The shredder(s) will be tested in the shop to verify operability before shipment. A field acceptance test will be run to verify that the installed equipment meets the performance requirements which have been specified in the revised specification, Section 13652, article 2.4, before payment of the vendor. Actual material to be processed will vary widely due to the heterogeneous nature of the waste pits. Flexibility of the shredder is considered more important than efficiency. The specified field acceptance test requirements will demonstrate this flexibility. Reliability of the shredder can only be demonstrated by extended (several months) operating experience. The storage pile between the two-stage process shredder (which now will provide dryer feed material as indicated in response to USEPA comment 8) and the dryer, will enhance operating reliability of the remediation facility.

Action: The revised shredder specification will be included with the Pre-final Design Packages.

11) Commenting Organization: U.S. EPA Commentor: Saric
Section #: 13652 Page #: 12 of 23 Line #: 23 and 24
Comment: In addition to stating the pressure of available water and high pressure(HP) air, the text should also specify the available volume of water and HP air at that pressure. Provisions should also be included in the event that the machine will require a higher volume of water and air or higher pressure.

Response: Comment Acknowledged. Air and water will be supplied as required for the shredder systems. Utility requirement information will be supplied by the equipment vendor. The information in Section 1.9.F is for reference only. Please note that shredder systems do not typically require air and water for continuous operations. These utilities are normally required intermittently for clean up and maintenance.

Action: Section 1.9.F will be identified as "for reference only" in the revised specification for the Pre-final Design Packages.

12) Commenting Organization: U.S. EPA Commentor: Saric
Section #: 13652 Page #: 13 of 23 Line #: 12 through 14
Comment: The text states that the material will be dropped into the shredder feed hopper from a height of 7 feet. However, the test does not specify the maximum weight of the material and the operational status of the shredder (that is, stopped or operating at full speed) while the material is dropped into the hopper. These details should be specified to permit the manufacturer to properly bid on this piece of equipment.

Response: Comment Acknowledged.

Action: The specification will be revised for the Pre-final Design Packages to indicate that the shredder must be capable of having the material dropped into the system from a height of one foot above the hopper when the shredder is operating at full speed. A 1000 pound maximum drop weight should be used for the test.

13) Commenting Organization: U.S. EPA Commentor: Saric
Section #: 13652 Page #: 16 of 23 Line #: 10 through 20
Comment: The text does not state in what manner fire will be detected in the shredder. The specification needs to include information regarding how fire will be detected and whether the fire suppression system will be activated automatically.

Response: Agree. At this time, the type of sensor and fire suppression system to be used is not yet fully developed.

Action: The Pre-final Design Packages will address these questions in detail.

Site Preparation Activities

14) Commenting Organization: U.S. EPA Commentor: Saric
Section #: Soil Grading Plan Page #: NA Line #: NA (Two sheets)
Comment: The soil grading plans indicate the contours of the proposed berms for the storm water management pond and the proposed railroad tracks. In order to evaluate the total site drainage, the plans should also show the contours for the proposed roads and other paved areas.

Response: Agree.

Action: The contours for the remaining areas, including proposed roads and the other paved areas will be included in drawings 91X-5900-G-000136 and 91X-5900-G-000137 in the Pre-final Design Packages.

Site Preparation Plans

15) Commenting Organization: U.S. EPA Commentor: Saric
Section #: Civil Details-Miscellaneous Page #: NA Line #: NA Sheet 3 of 4, Detail 2
Comment: This detail shows a cross-sectional drawing for a gravel road. In order to assist the contractor in bidding for the project, the required thickness and depth of the aggregate should be shown on the site plan, where appropriate.

Response: Agree.

Action: The thickness and depth of the aggregate for the gravel road will be included in Civil Details drawing 91X-5900-G-000145 on the Pre-final Design Packages.

16) Commenting Organization: U.S. EPA Commentor: Saric
Section #: Civil Utility Plan Page #: NA Line #: NA
Comment: The civil utility plan indicates that an existing 30-inch-diameter reinforced concrete pipe is to be removed from under the existing railroad tracks. However, the civil grading plan (sheet 1 of 2) indicates that this reinforced concrete pipe is to be abandoned and plugged in place under the tracks. Also, the civil grading plan shows both headwalls are to be removed. This inconsistency should be corrected and the plans revised accordingly.

Response: Agree.

Action: The civil utility plan will be corrected to show that the existing 30" diameter reinforced concrete pipe under the railroad tracks will only be partially removed with the remaining 30" pipe plugged in place. The correction will be included in the Pre-final Design Packages. The civil grading plan correctly shows that the headwalls are to be removed.

RESPONSE TO OHIO EPA COMMENTS ON THE OU1 REMEDIAL DESIGN PRELIMINARY DESIGN PACKAGES, I AND II

1.) Commenting Organization: Ohio EPA Commentor: DSW
Section #: General Page #: Line #: Code M
Original Comment #:
Comment: In a previous document (OU1 FS) statements were made which indicated that Sloan's crayfish would be able to re-establish after any short-term impacts from increased sediment loads during remediation activities (G-2-14). This may not be true. In addition to Sloan's crayfish, the locations that would be impacted by remedial activities contain populations of *Oronectes rusticus*, a species of crayfish much more tolerant to sediment loads. It is very likely that once Sloan's crayfish has been extirpated from the locations on the FEMP, it would not be able to repopulate, *O. rusticus* becoming the sole resident.

In consideration of the above, it was encouraging to read in the OU1 RD-PD that all contaminated water would be diverted from Paddy's Run (pp 2-43, 2-14. lines 27-40, 1-10; p 7-2, lines 24-35; and Table A-1, p A-1) and contained in a storm water management basin (SWMB) designed to hold a 25 year, 24 hour storm. There are, however, some potential problems with the proposed design.

The SWMB is located to the east of the waste pits. There is an emergency overflow that connects the SWMB to two other basins with an outlet to the drainage ditch which drains the north side of the property. This ditch flows to the west and into Paddy's Run just north (upstream) of the railroad bridge. This is just upstream of the population of Sloan's crayfish on the FEMP (Report on the Status of Sloan's Crayfish, *Oronectes sloanii* (Bundy, 1876) at the Fernald Environmental Management Project (FEMP) site, addendum, June 24, 1994, Figure 1). If the drainage point were located 0.1 mile downstream, it would be below any populations of Sloan's Crayfish and drain into a section of Paddy's Run that remains dry for large periods of time during the year and supports little, if any, aquatic life. This should also be considered in grading, so that any uncontrolled storm water discharge will flow downstream of the Sloan's populations before entering Paddy's Run. Perhaps the west or south of the waste pits would be a feasible alternative location for the SWMB. That should make it easier to direct any overflow and uncontrolled runoff downstream in Paddys Run.

Another factor that should be considered during remediation, and particularly during initial grading is that Sloan's crayfish will be least susceptible to silt impacts to Paddy's Run during the winter. This is when the crayfish should be in there burrows and relatively inactive.

Initial grading and soil stabilization should occur when they are least susceptible to silt load impacts.

Response: Comment Acknowledged. Additional impact on Paddys Run is expected to be small.

Overall the acreage added to the area that is drained by the ditch is very small. There are about three acres of new area north of the Stormwater Management (SWM) basin that drains to the ditch for all rainfall events. For the greater than 25-year rainfall events there are about 10 acres of new drainage area. These compare to an existing drainage area of over 1 square mile (640 acres). In addition to the silt retention capability of the SWM basin, all other required and necessary erosion control practices will be followed for all disturbed ground to minimize any silt carried to the ditch. Erosion control will be consistent with U.S.D.A.- S.C.S. Water Management and Sediment Control for Urbanizing Areas Manual and the site SWPPP.

The normal rainfall discharge from the SWM basin, for all storms up to a 25-year - 24-hour event, is through the AWWT, via the Biodenitrification Surge Lagoon (BSL). Only those storms greater than the 25-year event (one per 25 years or 0.04 probability per year of occurring) would discharge through the drainage ditch and into Paddys Run. Additionally, when these very infrequent events occur, all stream flows are very high and the effect from an additional flow is minimized.

Changing the SWM basin overflow discharge location to a westerly or southerly discharge would be very undesirable because of the unfavorable topography in those directions.

There is some schedule flexibility in planning of the construction activities. However, the site clearing, stormwater management system, and rough earthwork are the initial site activities and are tied to the 15-month ROD timeline which puts them in summer 1996. Wastewater generated from these activities will be directed to the stormwater management basin and managed in accordance with the existing site NPDES permit. Therefore, additional sediment loading on Paddys Run is not expected during this activity.

Action: No further action required.

2.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code:
Original Comment #:
Comment: Please provide a discussion of efforts made to reduce the quantity of waste generated by the D&D of the OU1 Remediation facilities. It is

Ohio EPAs expectation that DOE will incorporate into the design process principles of waste minimization. This would reduce both the volume of materials going to the OSDF and the costs incurred in decontaminating materials that could be potentially recycled.

In a similar fashion, please discuss strategies to reduce the hydraulic loading to the expanded AWWT. Any reduction of process waste water streams will be reflected in lower mass loadings to the GMR.

Response: Comment Acknowledged. DOE is committed to factoring waste minimization into the design of the OU1 remediation facilities. In the October, 1995 Operable Unit 1 Draft Preliminary Engineering Design Packages I and II, this was evidenced by the following item in Section 1.4.1 of the Design Criteria Document: "4) The remediation system will be designed with conscious attention to waste minimization (e.g., no structures or parts of structures will be constructed unless absolutely necessary to support the process or comply with ARARs)."

The use of mobile equipment for many material handling activities, rather than stationary equipment (e.g., lengthy fixed conveyors), is an example of efforts which have taken place to date. Not only can mobile equipment support a multiplicity of tasks, but also mobile equipment has a better chance for being reused following completion of the Operable Unit 1 remediation project.

Another effort undertaken, is a value engineering (VE) examination addressed at reducing the size of the remediation facility (e.g., overhead structures and concrete pads). Success in this effort will not only reduce the D&D burden, but will also reduce capital costs for constructing the remediation facilities. As the design progresses, additional input will also be specifically sought from those involved in facilities D&D on site, relative to suggestions on materials, methods, etc., used in constructing the OU1 remediation facilities which will facilitate the D&D.

The design process recognizes OEPA's interest in reducing hydraulic loads to the AWWT. For example, water collected from chiller blowdown and the condensate discharges would be collected and diverted to other uses, e.g., to the scrubber system as makeup for evaporative losses. Runoff water from the pits and from the plant area would be collected and used for dust suppression.

Action: Results of the Value Engineering effort will be evidenced in the March 21, 1996 Pre-final Design Packages. Also, the water systems and the approach to reducing wastewater loading to the AWWT will be presented in further detail in the Pre-final Design Packages.

Package I

3.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.3.1 Pg #: 1-12 Line #: 3 Code: C
Original Comment #:

Comment: This sentence states that the on-site disposal facility (OSDF) will accept contaminated soil and debris from OU1. Please rewrite this sentence to be consistent with the OU1 ROD relating to the acceptance of residual soil contamination (i.e., fourth bullet, page D-iii, final OU1 ROD).

Response: Agree. The Pre-final Design Packages will include revisions to this section, including the referenced sentence, to reflect the logic between the above referenced bullets in the OU1 ROD addressing the dispositioning of soils and the discussion currently in this section concerning disposal of soil in the OSDF. As discussed in the response to Ohio EPA comment #25, no efforts will be made to place any debris from the OU1 waste pit processing activities in the OSDF. This does not, however, include placement of materials in the OSDF from the D&D activities, which will be addressed through Facilities D&D remedial planning documents.

Action: Section 1.3.1 of the Design Criteria Document will be revised for the Pre-final Design Packages to read as follows:
"The premise of this section, is that there is a potential that certain of the soils generated as a result of the OU1 remediation activities may be amenable to disposal in the OSDF, and to therefore provide a summary of the waste acceptance criteria which would apply to such placement. As indicated in Section 1.2, the selected remedy in the OU1 ROD includes a key component associated with the management of residual contaminated soils specifically. Item 11 of Section 1.2 addresses the management by Aquifer Restoration Project of OU1 residual contaminated soils consistent with the selected remedy for contaminated process area soils as documented in the OU5 ROD. As discussed in greater detail in Section A.5 of the *Materials Management Plan*, the selected remedy for Aquifer Restoration Project provides for on-site disposal of soils which meet the WAC for the OSDF. Accordingly, OU1 soils which meet the OSDF WAC, provided in Table 1-1, will be disposed of in the OSDF. Pursuant to the OU5 ROD, soil containing contaminants that are incompatible with the clay liners or the underlying native clays beneath the liners will not be allowed in the OSDF. In addition, through the identification of specific geographical areas in the OU5 ROD, where efforts will be made to identify and segregate for treatment (as needed) the soil that qualifies as RCRA characteristic waste, it is envisioned that no significant quantity of RCRA characteristic materials will be placed in the disposal facility."

4.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.3.1 Pg #: 1-12 Line #: 6-7 Code: C
Original Comment #:
Comment: Please include the hazardous waste characteristic of TCLP, in the discussion of materials that will be excluded from the OSDF.

Response: Comment acknowledged.

Action: The Pre-final Design Packages will be revised to be consistent with the language in the OU5 ROD. The sentence which reads "Soils exhibiting the hazardous waste characteristics of reactivity, ignitability, or corrosivity will also be excluded," will be replaced with the following sentence: "In addition, through the identification of specific geographical areas in the OU5 ROD, where efforts will be made to identify and segregate for treatment (as needed) the soil that qualifies as RCRA characteristic waste, it is envisioned that no significant quantity of RCRA characteristic materials will be placed in the disposal facility."

5.) Commenting Organization: Ohio EPA Commentor: DERR
Section #: Table 1-1 Pg #: 1-13 Line #: Code: C
Original Comment #:
Comment: It is unclear within this table, what the units for total uranium are. Is it mg/kg or pCi/g?

Response: The unit for total uranium is mg/kg.

Action: This table will be revised in the Pre-final Design Packages to more clearly identify the correct unit for total uranium.

6.) Commenting Organization: Ohio EPA Commentor: DERR
Section #: Table 1.4.5 Pg #: 1-19 Line #: 6 Code: C
Original Comment#:
Comment: This sentence states that water sprays will be used for dust suppression. Will contaminated water be captured for pretreatment before disposal? Are drainage controls adequate to prevent runoff of water which is carrying contaminated dust? Same issue. Design Package II, page 5-2, line 26.

Response: Comment Acknowledged. DOE does not intend on adding such a significant quantity of water for dust control that run-off occurs. However, for all areas throughout the project where water sprays are used for dust control, the contaminated water is collected for treatment.

Within the waste pit area the existing stormwater management system will be used and modified as necessary as waste pit excavation progresses (See Section 5.5 of the Excavation Plan). This is appropriately discussed in greater detail in Section 5.5 of the Excavation Plan. Drainage and runoff from the waste pit area passes through the Clearwell (or Facility 18-N), thence to the Biodenitrification Surge Lagoon (BSL), and then to the AWWT.

Action: No action required. A more definitive discussion is appropriately provided in other design deliverables, as noted above.

7.) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 1.4.10 Pg #: 1-20 Line #: 21 Code: C
Original Comment #:
Comment: In the event of a power failure, can the emergency generator come on line quickly enough to prevent serious equipment damage or environmental releases?

Response: Comment Acknowledged. Upon loss of power, the drier will cease to rotate and the fuel gas supply and feed to the dyer will be automatically cut off, stopping the generation of off-gas. Automatic start-up of the generator (requiring approximately 15 seconds) will allow the drier to be rotated until cool and will allow the off-gas system to function as before.

Please note: The generator is not an <u>emergency</u> unit but a <u>standby</u> one as defined by article 700, NFPA 70. "Emergency" electrical equipment is required for life safety applications. DOE Order 6430.1A requires "emergency" electrical equipment where it is required within the normal life safety stipulations of article 700 of NFPA 70 and where equipment is designated "safety class" according to section 1300 of DOE 6430.1A. On this project no safety class equipment is anticipated. Standby equipment is provided for orderly shutdown in the event of a loss of normal power.

Action: No action required.

8.) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 2.1.1.2 Pg #: 2-2 Line #: 24 Code: C
Original Comment #:
Comment: This sentence states that airborne dust shall be minimized during pit excavation. How will this be accomplished? If spraying is used, will the runoff be adequately contained?

Response: Comment Acknowledged. DOE does not intend on adding such a significant quantity of water for dust control that run-off occurs. However, for all areas throughout the project where water sprays are used for dust control, the contaminated water is collected for treatment.

Within the waste pit area the existing stormwater management system will be used and modified as necessary as waste pit excavation progresses (see Section 5.5 of the Excavation Plan). Drainage and runoff from the waste pit area passes through the Clearwell (or Facility 18-N), thence to the Biodenitrification Surge Lagoon (BSL), and then to the AWWT.

Action: No further action required.

9.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2 Pg #: 2-31 Line #: 10,14 Code: C
Original Comment #:
Comment: What are potential sources for this cooling water? Are there possible benefits to using treated ground water from the AWWT? It is Ohio EPAs expectation that all process water flows will be minimized.

Response: Comment Acknowledged. The current PFDs show two heat exchangers in parallel (50% duty each) being cooled by a closed-loop chiller system. The chiller for this system may require a closed-loop cooling tower with the usual need for blowdown and minimum process water makeup. This and all other process water requirements will be minimized to the extent practicable and cost effective.

Additional process water flows will be minimized, see Section 7.1 of the Process Description. The water demand that cannot be provided by recycle loops will be made up from process water sources of acceptable quality. Although AWWT discharge water may be a possible source, concerns associated with potential pretreatment and other costs for conveying this water, may override any benefit from this source. OU1 plans involve use of stormwater runoff and various wastewater discharges for dust suppression operations, washdowns, etc.

Action: The water systems and the approach to minimizing process water demand will be presented in the Pre-final Design Packages.

10.) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 2.3.2.3 Pg #: 2-34 Line #: 3-4 Code: C
Original Comment #:
Comment: Lines 3 and 4 recommend a corrosion allowance of 1/16 inch for carbon steel tanks. The Ohio EPA suggests that any tank experiencing sufficient corrosion to need that much allowance, should be replaced with stainless steel. A severely corrosive environment might concentrate damage into localized pitting corrosion, or even cracking, rather than uniformly attacking the metal. Thus a tank could be breached even if its uniform corrosive attack amounted to only 1/16th inch.

Response: Agree. DOE does not anticipate any "severely corrosive environment" where carbon steel tanks will be used.

Action: The 1/16" corrosion allowance will be eliminated from the Design Criteria Document in the Pre-final Design Packages as a general criteria for carbon steel tanks.

11.) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 2.3.6.3 Pg #: 2-50 Line #: 34-39 Code: C
Original Comment #:
Comment: Please confirm that low profile buildings can have a wind loading safety factor of only 1.0.

Response: Comment Acknowledged. Per DOE 6430.1A, Section 0101-1, "Criteria Purpose and Application", DOE projects are to accommodate the intent of local codes and regulations as much as possible. More stringent requirements for factor of safety equal to 1.5 required by OBBC shall be used for <u>all</u> building and structures, including the low rise structures.

Action: The Design Criteria Document in the Pre-final Design Packages will be clarified as indicated above.

12.) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 2.3.9.3 Pg #: 2-60 Line #: 37 Code: C
Original Comment #:
Comment: This line states that no safety-class services requiring emergency generator backup are anticipated. What does this statement mean and what are its implications for safety?

Response: Comment Acknowledged. Diesel engine generators of this type normally are able to start within 10 to 15 seconds after loss of power because its purpose is to prevent damage to equipment (i.e., the

dryer will continue to rotate until it has cooled). On power failure, the fuel gas supply and feed to the dryer would be automatically cut off, thus stopping the generation of off-gas.

Further relevant discussion: The generator is not an emergency unit but a standby one as defined by article 700, NFPA 70. "Emergency" electrical equipment is required for life safety applications. DOE Order 6430.1A requires "emergency" electrical equipment where it is required within the normal life safety stipulations of article 700 of NFPA 70 and where equipment is designated "safety class" according to section 1300 of DOE 6430.1A. On this project no safety class equipment is anticipated.

Action: No further action required.

13.) Commenting Organization: Ohio EPA Commentor: DERR
Section #: ARARs/TBCs Pg #: A-7 Line #: Code: E
Original Comment #:
Comment: ARARS section, entry for air discharges has garbled text under compliance strategy.

Response: Comment Acknowledged.

Action: The ARARs table will be revised in the Pre-final Design Packages to correct word processing errors.

14.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Process Description Pg #: 5-4 Line #: 35 Code: C
Original Comment #:
Comment: The radon removal efficiency of the carbon beds is 0.97. The carbon beds that are to be used in the Vitrification Pilot Plant are estimated to have only 85% efficiency. Please explain the design elements in this system that will allow operation at a higher efficiency.

Response: Comment Acknowledged. The 97% efficiency was initially used for the vitrification pilot plant (VPP). However, after actual testing, 85% was determined to be more realistic for that system design (97%, however, could be achieved if certain design modifications were made).

This information is not directly applicable to the dryer off-gas system since the VPP and dryer off-gas systems are two separate and distinct system designs (they differ in flowrate, off-gas composition, size of carbon beds, etc.). The differences in these design parameters will result in differences in system operating efficiencies.

From an engineering design standpoint, the efficiency of the carbon bed is determined based upon the incoming radon concentration and the required limit on radon emission. The radon emission limit is still being determined for the dryer off-gas, therefore the required carbon bed efficiency (or the actual need for carbon beds for the dryer off-gas) has yet to be determined.

Action: The Process Description will be revised for the Pre-final Design Packages to remove the reference to 97% efficiency, and state that the dryer off-gas system will be designed to meet the limit on radon emission.

15.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Process Description Pg #: 7-2 Line #: 14,32 Code: C
Original Comment #:

Comment: The Ohio EPA concurs that recycling of condensate water for reuse in washing or dust control should be maximized. It is our expectation that all process water streams will be evaluated and minimized to reduce hydraulic loading to the expanded AWWT. Ohio EPA urges DOE to develop methods to reduce the volume of process waste water and storm water flows to the AWWT. If the possibility to "privatize" the OU1 operations is realized, Ohio EPA expects that there will be incentives built into the process that will encourage the sub-contractor to minimize the production of waste water.

Response: Comment acknowledged. The design process recognizes OEPA's interest in reducing hydraulic loads to the AWWT. For example, water collected from chiller blowdown and the condensate discharges would be collected and diverted to other uses, e.g., to the scrubber system as makeup for evaporative losses. Runoff water from the pits and from the plant area would be collected and used for dust suppression.

If DOE decides to proceed with a privatized concept, consideration will be given to incorporating incentives into the process to encourage the subcontractor to minimize the production of waste water.

Action: The water systems and the approach to reducing wastewater loading to the AWWT will be presented in further detail in the Pre-final Design Packages.

16.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Grading Plan Pg #: 91X-5900-G-00136 and
Pg #: 91X-5900-G-00137 Line#: Code: C
Original Comment #:
Comment: Several existing monitoring wells will be effected by the construction of the remediation system. Please discuss the closing of these wells and the installation of replacements wells.

Response: Comment Acknowledged. Of the fifteen (15) monitoring wells potentially impacted by the planned site preparation and construction activities, eight (8) were originally installed to monitor perched water zones in the glacial overburden, four (4) were installed to monitor the top of the Great Miami Aquifer (GMA), two (2) were installed to monitor the middle of the GMA, and one was installed to monitor the base of the GMA. The table included provides further information about these monitoring wells.

WELL NUMBER	STATUS	REMARKS
1030	Plugged/Abandoned	Previously Plugged and Abandoned.
1038	Glacial Till Well	Scheduled for Plugging and Abandonment, Fiscal Year 1996.
1076	Glacial Till Well	Scheduled for Plugging and Abandonment, Fiscal Year 1996.
1077	Glacial Till Well	Scheduled for Plugging and Abandonment, Fiscal Year 1996.
1952	Glacial Till Well	Scheduled for Plugging and Abandonment, Fiscal Year 1996 - Located just Northeast of Well 2953.
11077	Glacial Till Well	Scheduled for Plugging and Abandonment, Fiscal Year 1996.
11215	Glacial Till Well	Scheduled for Plugging and Abandonment, Fiscal Year 1996.
11216	Glacial Till Well	Scheduled for Plugging and Abandonment, Fiscal Year 1996.
2454	Top of Aquifer Well	Will retain for future ground water monitoring purposes.
2648	Top of Aquifer Well	Will retain for future ground water monitoring purposes.
2821	Top of Aquifer Well	Will retain for future ground water monitoring purposes.
2953	Top of Aquifer Well	Will retain for future ground water monitoring purposes.
3001	Middle of Aquifer Well	Will retain for future ground water monitoring purposes.
3821	Middle of Aquifer Well	Will retain for future ground water monitoring purposes.
4001	Base of Aquifer Well	Scheduled for Plugging and Abandonment, Fiscal Year 1996.

Present and Future Status of Wells in the Vicinity of the Waste Pits Remediation Facility Area.

Action: DOE will plug and abandon all glacial overburden, or Type 1 wells. All top of GMA, or Type 2 wells, will be retained for future ground water monitoring purposes. All middle of GMA, or Type 3 wells, will be retained for future ground water monitoring purposes. The base of GMA well, or Type 4 well, will be plugged and abandoned. The Type 4 well is no longer required for GMA monitoring purposes, and thus, will not be replaced unless determined to be necessary by the FEMP Ground Water Programs staff. No additional monitoring wells will be installed.

All wells to be plugged and abandoned will be done so during Fiscal Year 1996. Plugging and abandonment will be performed in

accordance with FEMP Plugging and Abandonment standard operating procedures, OAC 3745-9, and American Society for Testing and Materials standards. All wells to be retained will be fitted with reinforced steel posts set into concrete adjacent to the well heads, to minimize the possibility of damage to the wells from facility construction activities.

17.) Commenting Organization: Ohio EPA Commentor: DERR
Section #: Dryer Specification Pg #: 28 of 61 Line #: 28 Code: C
Original Comment#:
Comment: The requirement for a maximum deflection of 0.0002 mils between supports seems too stringent. It is doubtful such a small deflection could be practically measured, let alone achieved.

Response: Agree. This was a typographical error and should actually read 20 mils.

Action: The error will be corrected in the Pre-final Design Package dryer spec.

18.) Commenting Organization: Ohio EPA Commentor: DERR
Section #: Off-Gas Control, 15060 Pipe, Fittings, Valves, etc.
Pg #: 10 of 10 Line #: Code: C
Original Comment #:
Comment: Please check the design and test pressures for this off-gas system. What does -35 psig in w.g. mean? This appears wherever this section is repeated.

Response: Comment Acknowledged. The design and test pressures are correct as stated. "-35 in. w.g." means that the design pressure is 35 inches of water gage, vacuum. There is no mention of psig for this design pressure. "-35 in. w. g." is approximately equal to 13.4 psia.

Action: No action required.

19.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Excavation Plan Pg #: 6-1 Line #: 37 Code: C
Original Comment #:
Comment: Ohio EPA concurs that addressing public concerns is a valid reason to initiate an air monitoring program. We believe that a real-time particulate air monitoring program should be implemented regardless of the outcome of the modeling.

Response: Comment Acknowledged. DOE has been investigating to determine if real-time air particulate air monitors exist that my be applicable to the activities at the FEMP. At this time, no known monitors exist that

may be applied towards environmental radiological air particulate monitoring on a real-time basis.

Action: No action required for the Pre-final Design Packages. DOE will continue to evaluate existing equipment for this purpose.

20.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Excavation Plan Pg #: 6-2 Line #: 26 Code: C
Original Comment #:
Comment: Ohio EPA believes that the public concerns regarding air monitoring will be addressed best if the air monitors are located to detect the maximum levels that are being released to uncontrolled areas rather than at areas which may be considered representative of what is being released.

Response: Agree.

Action: The Excavation Plan will incorporate air monitoring for maximum levels for the Pre-final Design Packages.

21.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Materials Mgm't Plan Pg #: A-16 Line #: Figure A-2 Code: C
Original Comment #:
Comment: It is unclear from the chart what processable waste streams are to be placed in the on-property disposal facility.

Response: Agree; the only "OU1 Processable Wastes" that will be placed in the OSDF are soils (v. waste pit contents) which meet the WAC for on-site disposal.

Action: Figure A-2 is being revised (for OU1 Processable Wastes) to show a block between "Package for Transport" and "Placement in the On-Site Disposal Facility", which shows that the material proceeding along this path includes only "Soils Which Meet the WAC for On-Site Disposal." The revisions will be incorporated into the Materials Management Plan for the Pre-final Design Packages.

22.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #:91-X-G-5900 Pg #: A-16 Line #: Figure A-2 Code: C
Original Comment #:
Comment: Section A shows that uncontaminated soil will be used to backfill for the construction of the access ramp. Use of uncontaminated material should be minimized.

Response: Comment Acknowledged. Uncontaminated soil in this drawing is intended to mean that the utilization of the relatively uncontaminated waste pit soil covers will be used as backfill in the construction of the access ramp. Utilizing this approach will allow DOE to eliminate the contamination of additional soils while also minimizing airborn contamination that will result from trucks driving over the soils.

Action: The Pre-final Design Packages drawing will not that uncontaminated soils refers to waste pit cover soils.

23.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Transportation Plan Pg #: 7-10 Line #: Figure 7-4 Code: C
Original Comment #:
Comment: The circled numbers on the map are not in the right states.

Response: Comment Acknowledged. The numbers on the map denote the involved DOE Region, not the state in which DOE's Regional Coordinating Office for Radiological Assistance is located.

Action: No action required.

24.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #:02713 Detention Pond Geosynthetics Pg #: 6 of 9 Line #: 9 Code: C
Original Comment #:
Comment: Page 6, Section 3.2(A) states that the soil beneath the liner shall be sterilized to prevent the growth of vegetation and the choice of herbicide is to be made by a local agricultural authority. It should also be stated that the compatibility of the herbicide and the carrier be checked with the liner manufacturer.

Response: Agree. In reconsideration, the use of a herbicide is not considered necessary for subgrade preparation and satisfactory liner performance.

Action: The requirement to use a herbicide below the geomembrane will be deleted from the Detention Pond Geosynthetics specification for the Pre-final Design Packages submittal.

Additional General Comments

25.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Pg #: Line #: Code: M
Original Comment #:

Comment: The option to dispose of large debris with the OU3 materials has not taken into account several critical factors that are unique to the WAC development of OU3. Specifically, the OU3 WAC for technetium-99 has been developed using a mass-based approach. The additional mass of Tc-99 from the OU1 debris has not been considered in the WAC development. Additionally, other potential constituents within the OU1 debris were not incorporated into the OU3 WAC development.

Ohio EPA believes DOE must exhaust all size-reduction opportunities prior to opting for transfer of waste pit wastes to OU3. DOE must attempt to utilize disposal opportunities at Envirocare and NTS prior to considering forwarding the material to OU3. The types of debris that cannot be size-reduced has not been explicitly stated. Please give examples of the types and volumes of debris which may be potentially encountered that are not amenable to size reduction. Additionally, a justification for these estimates should be provided.

Additionally, a number of the design drawings state the materials will be disposed of on-site. Such statements are premature considering the OU3 RI/FS has yet to be approved and that such material would be more like process related metals (proposed for off-site disposal) than any other OU3 waste category.

Response: After reconsideration of the various issues associated with placing debris from the waste pits into the OSDF, DOE has concluded that there is no significant benefit in pursuing this option. Therefore, all debris originating in the pits will be sent off-site for disposal. This does not, however, include placement of materials in the OSDF from the D&D activities, which will be addressed through Facilities D&D remedial planning documents.

Action: The various Pre-final Design Documents will be revised to reflect that no debris from the waste pits will be placed in the OSDF.

OEPA COMMENT NUMBERS 26, 27, AND 28 ARE BEING ADDRESSED IN A SINGLE RESPONSE (UNDER COMMENT 28) BECAUSE THE COMMENTS ADDRESS SIMILAR CONCERNS.

26.) Commenting Organization: Ohio EPA Commentor: DHWM
Section #: General Pg #: Line #: Code: C
Original Comment #:
Comment: OEPA DHWM does not consider the Remedial Design document to have adequately addressed concerns associated with the management and treatment of RCRA characteristic wastes. The Remedial Design document should acknowledge that remediation activity will involve excavation and treatment of RCRA characteristic hazardous waste.

27.) Commenting Organization: Ohio EPA Commentor: DHWM
Section #: General Pg #: Line #: Code: C
Original Comment #:
Comment: Section 2.0 of the Final OU1 ROD acknowledges the uncertainty surrounding both the Hazardous Waste Management Unit (HWMU) status, and presence of RCRA characteristic wastes associated with Pit 5. The ROD indicated that a final characterization of Pit 5 waste would be completed following treatment. The ROD summarized Pit Waste concentration ranges for contaminants of concern. Remediation activity may involve excavation of regulated levels of RCRA TC waste regardless of the HWMU status of a particular waste pit. Additional RCRA characterization of waste material from other pits may be required prior to disposal. It would seem prudent then, to conduct remediation as if RCRA TC wastes were being managed in this activity.

28.) Commenting Organization: Ohio EPA Commentor: DHWM
Section #: Table A-3, Pkg 1 Pg #: Line #: Code: C
Original Comment #:
Comment: Please refer to the action specified ARARs. The Ohio EPA DHWM does not agree that OAC 3745-56-51, 54 and 58 requirements do not apply to the processing of any OU1 wastes. Please reference this ARAR as outlined in the ROD. Current language in the "compliance strategy" for this ARAR is inconsistent with the ARAR in the ROD. Current language in the "compliance strategy" for this ARAR is also confusing. Please revise the ARAR to clarify applicability of hazardous waste regulations governing waste piles. Unless DOE-FEMP can show further justification as to why these ARARs are not relevant, the document should be revised to include a description of the design standard, procedures and controls developed to achieve compliance with hazardous waste management regulations appropriate to storage and treatment activity involving waste piles.

Response: Response to numbers 26, 27, and 28:
Comment acknowledged; In accordance with the OU1 ROD, characterization of OU1 material will be conducted after treatment, but prior to off-site shipment. Treatment of OU1 pit wastes will generate a homogenous waste stream that best represents the waste stream to be disposed. The treated waste stream must comply with regulatory requirements and disposal facility waste acceptance criteria for radiological concentrations, and must be characterized with respect to RCRA.

Data in the OU1 RI do not indicate the presence of RCRA characteristic wastes throughout the waste pit area. If, during waste acceptance criteria sampling, RCRA characteristic wastes are identified, the waste will be packaged and shipped to a low-level disposal facility that is also capable of treating and disposing RCRA waste.

OAC 3745-56-51, 54, 58 establish requirements for design/operation, monitoring/inspection, and closure of hazardous waste in piles. DOE believes these requirements are not applicable because the OU1 feedstock and 14-day storage piles are part of the ongoing remediation process. However, DOE recognizes OEPA's concerns relative to the management of this material and believes that the OU1 design meets the substantive intent of the requirements. For example, the processing facility which includes feedstock piles is located under cover and on a concrete surface with run-on/run-off collection control; the feedstock and 14-day piles will be managed to control wind dispersal; and the processing facility will be remediated to remove all processing facilities and residual contamination consistent with established remediation levels.

Action: The Permit-Information-Summary and ARARs Crosswalk in the Design Criteria Document will be revised for the Pre-final Design Packages to show how the OU1 design meets the substantive intent of the requirements.