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**ARASA SOW (COMMENTS ON THE ALTERNATIVE REMEDIAL ACTION
SUBCONTRACTING APPROACH STATEMENT OF WORK)**

07/29/96

OEPA

DOE-FN

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COMMENTS



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

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J. 2581
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George V. Voinovich
Governor

July 29, 1996

Re: DOE FEMP
MSL 531-0297
HAMILTON COUNTY
ARASA SOW

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

Dear Mr. Reising:

Ohio EPA reviewed the Alternative Remedial Action Subcontracting Approach Statement of Work and developed the attached comments. In your consideration of the comments please keep in mind that Ohio EPA has no particular expertise in the Federal contracting arena. The comments are not intended to suggest in any way that DOE-FN or FERMCO should disregard or act in violation of any Federal contracting requirements.

If you should have any questions concerning this letter feel free to contact Jim Coon (513.285-6074) or me.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

Att.

cc: Jim Saric U.S. EPA
Terry Hagen, FERMCO
Ruth Vandegrift, ODH
Mike Proffitt, DD&GW
Sharon McLellan, PRC
Dave Ward, Geo Trans

APR 15
PARTIAL
ACTION RESPONSE
TO DOE 1060-06
1995

Ohio EPA Comments on OU1 ARASA SOW

1. The majority of Ohio EPA comments are a reiteration of the issues expressed in Ohio EPA Director Schregardus' concurrence letter on the OU1 ROD. Those issues are restated here for clarity and reference:
 - Real-time monitoring for discharges should be used to the maximum extent possible during remedial actions. DOE should incorporate new developments in real-time monitoring during implementation of the remedy. Data from this monitoring should be provided to the Ohio EPA and public in a timely manner;
 - Pollution prevention activities should be incorporated into the design and implementation of the selected remedial alternative. All available methods to reduce or eliminate discharges from the treatment system should be considered during the design of the system;
 - Finally, DOE must maintain the high level of public participation and community involvement currently present at the FEMP throughout the Remedial Design and Remedial Action.

Emphasizing these issues within the SOW would be a significant step towards selecting a contractor which understands the concerns of Ohio EPA and other stakeholders.

2. Ohio EPA believes emphasis should be placed within the SOW for a contractor with mobile treatment units that will be removed from the site following completion of the OU1 Remedial Action. Preferences should be given to all efforts to reduce facility size and subsequent waste/debris generation resulting from its decommissioning.
3. Ohio EPA expects the selected contractor will minimize if not eliminate the need for waste/debris from the OU1 remediation facilities to be disposed in the OSDF. Ohio EPA recommends revision of the SOW to emphasize this.
4. For concrete debris generated during D&D of the OU1 facilities, size reduction should be implemented prior to disposal. This should not occur only to attain WAC for the destination disposal site, but to minimize total packaged waste volume.
5. Clarification of the term PCDF should be added to this SOW. The term PCDF should never be understood to refer to any facility other than a permitted commercial radiological disposal facility.
6. The document should state that no solid waste facilities in the State of Ohio should be used for the disposal of D&D wastes from OU1 even if the wastes have been free released or moved off site under the NRC license of the subcontractor. This comment is consistent with Ohio EPA's concerns relating to the disposal of remediation wastes in

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commercial sanitary landfills and relates to the text in section J.4.3.2.2.

7. Section C.3.2.1.3.7 suggests that hay bails will be used for erosion and sediment control instead of rocks. Hay bails are not a suitable or acceptable substitute for rocks and may not be used. The SOW should reflect this.
8. Significant clarification regarding the interaction of the subcontractor and wastes from other OUs should be added to the SOW. The subcontractor must create an area to accept these wastes, but then what? Does the subcontractor package the materials for shipment or does FERMCO deliver loaded rail cars? Responsibilities during this FERMCO-subcontractor-FERMCO waste handling should be better explained.
9. Prior to the operation of the vitrification plant and the dryer DOE needs to submit a baseline estimate of the radon levels at the fenceline based on actual fenceline measurement taken in the OU1/OU4 areas. This needs to be accomplished in order to establish compliance with the .5pCi/L above background standard cited in the SOW.
10. The reference to "Ohio EPA's office of Federal Facility Compliance" on Page C.1-3 should be changed to "Ohio EPA's Office of Federal Facilities Oversight".