

373

4-308.3  
~~4-408.11~~

COMMENTS - EVAL. OF SILO 3 ALTERNATIVES

08/26/96

OEPA  
5  
COMMENTS

DOE-FN



State of Ohio Environmental Protection Agency

Southwest District Office

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

FERNALD  
J-2787  
Aug 26 8 47 AM '96  
FILE: 1441  
LIBRARY

George V. Voinovich  
Governor

August 26, 1996

RE: DOE FEMP  
HAMILTON COUNTY  
COMMENTS - EVAL. OF SILO 3  
ALTERNATIVES

Mr. Johnny Reising  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Please find enclosed Ohio EPA comments on the draft final Evaluation of Silo 3 Alternatives received by Ohio EPA on July 11, 1996. The Ohio Department of Health, Bureau of Contamination, Contaminated Sites Unit has also reviewed this document and provided feedback to Ohio EPA.

The document does not satisfactorily address Ohio EPA's concerns regarding changing the preferred alternative as stated in the OU-4 Record of Decision. In addition to incorporating Ohio EPA's comments, DOE needs to clearly state the advantages and disadvantages of both vitrification and each alternative in a revised submittal.

At the present time, it is Ohio EPA's opinion that cement stabilization provides a remedy which is as protective and more reliable than vitrification. The Evaluation of Silo 3 Alternatives fails to clearly make that argument. In addition, it does not adequately address the potential benefits of off-site treatment and disposal for Silo 3 waste. In comparing the proposed alternatives in the framework of the "balanced approach" and getting these wastes off-site to protective disposal as soon as possible, off-site treatment and disposal is an attractive alternative. However, more detailed, convincing information is needed before any decision is made.

If you have any questions, please contact Kelly Kaletsky (513) 285-6454 or me.

Sincerely,

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

(akgunduz(n))  
partial  
action response  
to doe-1129-96 (9870)

cc: Jim Saric, USEPA  
Terry Hagen, FERMCO  
Ruth Vangergrift, ODH

Sharon McLellan, PRC  
Dave Ward, GeoTrans  
Manager, TPSS/DERR/CO



Ohio EPA Comments  
 August 26, 1996  
 Page 2

Section #: General Comment Pg #: Line #: Code: M  
 Original Comment #:

Comment: If DOE is able to provide additional justification for an alternative treatment method for Silo 3 and receive approval for it, they may wish to consider the use of performance-based contracting. Performance-based criteria would include the need for on-site treatment to meet PCDF WAC, off-site disposal, initiation and completion by a specified date, etc. This may allow contractors with alternative treatment methods (e.g., polymer encapsulation, etc) to bid on the contract. Ohio EPA would be open to a discussion of this concept for Silo 3.

Response:

Action:

5. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: General Pg #: n/a Line #: n/a Code: C

Original Comment #:

Comment: All of the alternatives listed do not address shipment of wastes via railways. Can the OU1 rail spur be used by OU4 to ship wastes via rail. Shipping and handling appear to be one of the most expensive items of the alternatives listed.

Response:

Action:

6. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: Alternative ALT3 Pg #: General Line #: n/a Code: C

Original Comment #:

Comment: It is stated that this alternative requires an amendment to the ROD based on the fundamental change that the wastes would not be stabilized onsite. Will the additional requirements of a ROD amendment as opposed to an ESD significantly alter the time necessary to implement this alternative.

Response:

Action:

7. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: Alternative ALT3 Pg #: General Line #: n/a Code: C

Original Comment #:

Comment: This alternative, as estimated, will basically cost the same as the other alternatives, including O&M, and treatment before shipment. Have other methods of treatment (e.g., polymer encapsulation) been investigated that may reduce the treatment costs, and possibly, allow for earlier clean-up of Silo 3.

Response:

Action:

8. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: General Pg #: Line #: n/a Code: C

Original Comment #:

Comment: What ARAR's are serving as drivers for requiring the preconditioning of Silo3 material before off-site treatment and disposal? If no ARARs require this treatment, then an additional alternative which does

Ohio EPA Comments  
 August 26, 1996  
 Page 3

not include preconditioning should be included in the document.

Response:

Action:

### Specific Comments

9. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: Exec. Summ. Pg #: ES-8 Line #:16-21 Code: C

Original Comment #:

Comment: The short term effectiveness evaluations do not appear to account for the negative aspects of building additional treatment facilities on-site. Such impacts include additional wastes for disposal, potential construction accidents, and extremely short operation life. It would seem that the VIT and ALT 3 have the most short-term protectiveness with regard to this aspect. A brief discussion should be added to the short-term effectiveness evaluations for each alternative regarding the construction of additional on-site facilities.

Response:

Action:

10. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: Exec. Summ. Pg #:ES-11 Line #: 11-19 Code: C

Original Comment #:

Comment: If an ESD was approved for Silo 3, why does DOE proposed to continue vitrification testing for Silo 3 materials. If a cementation alternative is selected it seems to be a waste of both money and schedule to continue vitrification testing of Silo 3 materials. DOE should provide additional discussion of why such testing is proposed to continue.

Response:

Action:

11. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 1.4.2 Pg #:1-23 Line #:8-11 Code: M

Original Comment #:

Comment: This section of text suggests no decision should be made until completion of the VITPP operations which is not schedule to start Phase II until a year from now. Such a statement only adds to Ohio EPA's reluctance to move forward with the ESD.

Response:

Action:

12. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3.2.3 Pg #:3-37 Line #:19-31 Code: M

Original Comment #:

Comment: DOE has not provided sufficient detail regarding the potential need to invoke CAMU. Specific examples of necessary uses need to be included. Ohio EPA is not willing to provide a blanket approval of use of CAMU for Silo 3 materials at Fernald.

Ohio EPA Comments  
August 26, 1996  
Page 4

Response:

Action:

13. Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 3.2.4      Pg #:3-40      Line #:9-14      Code: C

Original Comment #:

Comment: This paragraph appears to be discussing the stabilization alternatives rather than the VIT alternative that the section is directed towards.

Response:

Action: