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SCRAP METAL DISPOSITION ALTERNATIVES (OEPA COMMENTS ON THE DRAFT DECISION METHODOLOGY FOR FERNALD SCRAP METAL DISPOSITION ALTERNATIVES DOCUMENT HANDED OUT AT THE 06/11/9 PUBLIC WORKSHOP ON RECYCLING, SEE G-000-1005.112 FOR FURTHER DOCUMENTATION)

08/06/96

OEPA DOE-FN
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COMMENTS

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J-2629

AUG 27 AM '96

George V. Voinovich
Governor

August 6, 1996

RE: DOE FEMP
MSL 531-0297
HAMILTON COUNTY
SCRAP METAL DISPOSITION
ALTERNATIVES

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

Dear Mr. Reising:

The Ohio EPA has read and reviewed the Draft Decision Methodology for Fernald Scrap Metal Disposition Alternatives which was presented to the public at the workshop held on June 11, 1996. The Ohio EPA generally agrees that the methodology appropriately considers values and benefits to constructive disposition of scrap metals in lieu of on-site disposal. We offer the following comments:

- The scope of this methodology has been limited to scrap metals only. In fact, only two metals are specifically mentioned, steel and lead. To what if any extent will this decision methodology be extended to other materials such as scrap copper, stainless steel, concrete and similar wastes.
- Is this decision methodology consistent with DOE national policy? The Ohio EPA has had an outstanding request for a copy of the national policy for quite some time.
- Section 4.1.1 discusses the criterion net present value. The Ohio EPA agrees that hidden costs in overhead accounts must be extracted and assigned to the appropriate alternative. Conversely hidden liabilities must also be estimated. In the example discussed in the third paragraph of this section, incremental costs associated with disposal of metal in the OSDF are mentioned. How can these incremental costs be estimated? In response to similar questions regarding incremental costs associated with disposing of a unit volume of monolithic concrete, Ohio EPA was told that there was in fact no incremental cost increase associated with the disposal of bulk objects. This response is counter intuitive.
- Section 5.2 discusses "Structured Multiattribute decision making approaches". The Ohio EPA agrees that the progressive articulation of preferences method is open to criticism because it is open to manipulation. One solution to this problem was to use interactive search methods as mentioned in the last sentence of the third paragraph on page 22. However, the use of interactive search methods was not further discussed. Considering the inherent problems with progressive methods, a more thorough discussion of interactive search methods seems appropriate.
- The last sentence of Section 5.2 concludes that the analytical hierarchy process (AHP) is open to criticism because it produces inconsistent results. Is the Ohio EPA correct in inferring that either multiattribute value theory (MAVT) or multiattribute utility theory

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(MAUT) are therefore the preferred methods? If this is the case, please discuss the phrase "decision maker risk attitudes" which distinguishes the two theories. The phrase appears at the top of page 23 and is not discussed further.

- The Ohio EPA agrees with the first paragraph of Section 6 which concludes that this methodology should be applied to the entire FEMP site and also to the entire DOE complex.

The Ohio EPA would like to restate several positions that we have taken regarding the values to be placed on recycling, reuse, and waste minimization. Firstly, the Ohio EPA is dismayed that our approval of the OSDF has resulted in traditional cost/benefit analyses that inevitably conclude that on-site disposal is the least-cost alternative. This decision methodology provides a positive step forward. Secondly, DOE has consistently underestimated the cost of on-site disposal especially for steel beams and monolithic blocks of concrete. It has been our position that special handling, additional efforts required to compact surrounding soils and the additional testing necessary to verify that this compaction has been achieved will all drive the costs for disposal of these items higher. Additionally, there has not been a mechanism in place to weigh potential benefits that could result from beneficial re-use. One such reuse would be the placement of iron shards in the OSDF as an agent to chemically immobilize uranium. The potential risks to the cell liner from punctures should be considered in the cost/benefit analysis. Quantification of all these issues might result in the conclusion that it is fact desirable to shred scrap steel prior to placement in the OSDF.

In conclusion, Ohio EPA is optimistic about the potential benefits of this methodology. As always, we are available to discuss these issues further and to participate in the implementation of the methods that are described in the document. If you have any questions, please contact Tom Ontko or me.

Sincerely,

Tom Ontko for

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

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