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**OHIO EPA COMMENTS ON TEH OU3 BOILER PLANT/WATER PLANT
IMPLEMENTATION PLAN**

11/06/96

**OEPA DOE-FN
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COMMENTS**



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich
Governor

November 6, 1996

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

Subject: Ohio EPA Comments on the OU3 Boiler Plant/Water Plant Implementation Plan

Dear Mr. Reising:

Please find as an attachment to this cover letter the Ohio EPAs comments on the OU3 Boiler Plant/Water Plant Implementation Plan which was received in our office on September 16, 1996. Should you have any questions regarding these comments, please feel free to contact Tim Hull or me.

Sincerely,

Timothy C. Hull

^{for}
Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, USEPA V, Chicago
Terry Hagen, FERMCO
Sharon McClellan, PRC, Chicago
Ruth Vandegrift, ODH
Manager, TPSS, DERR, CO
File

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partial
action response
to doc-1336-96
(10089)

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Ohio EPA Comments on the OU3 Boiler Plant/Water Plant Implementation Plan

1.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.2 Pg #: 8 Line #: 20 Code: C

Original Comment #:

Comment: Please provide additional clarification within the text as to why concrete samples which exceed 20 times the TCLP level for chromium are not to be classified as RCRA material.

Response:

Action:

2.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.2 Pg #: 9 Line #: 5 Code: C

Original Comment #:

Comment: Please explain in further detail why the majority of the equipment and structures will be managed as containing lead based paint, yet steel with lead based paint (pg 8, line 25), will not be managed as such.

Response:

Action:

3.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: GENERAL Pg #: Line #: Code: C

Original Comment #:

Comment: The OU3 ROD identified the Implementation Plans as the mechanism to appraise and evaluate new technologies for recycle and reuse of OU3 materials generated from D&D activities. It was Ohio EPAs understanding that the Implementation Plans would not contain a specific section that would summarize these efforts. It was also our understanding that the draft Decision Methodology for Fernald Scrap Metal Disposition Alternatives would be incorporated into this section. Please incorporate these commitments into the revised document.

Response:

Action:

4.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.3.4 Pg #: 16 Line #: Code: C

Original Comment #:

Comment: In light of general comment #3 above, please elaborate on the storage methods that will be used to segregate uncontaminated materials from this complex from contaminated materials from other D&D actions. The very general description of storage in this section does not appear to prevent the contamination or mingling of clean Boiler Plant/Water Plant materials from other materials on the storage pads.

Response:

Action: