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**COMMENTS - EVALUATION OF SILO 3 ALTERNATIVES - DRAFT FINAL**

**01/17/97**

**OEPA            DOE-FEMP**  
**5**  
**COMMENTS**



State of Ohio Environmental Protection Agency

Southwest District Office

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Dayton, Ohio 45402-2911  
(513) 285-6357  
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George V. Voinovich  
Governor

January 17, 1997

RE: DOE FEMP  
MSL 531-0297  
HAMILTON COUNTY  
COMMENTS - EVALUATION OF  
SILO 3 ALTERNATIVES - DRAFT  
FINAL

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

Dear Mr. Reising:

Ohio EPA has received DOE's Evaluation of Silo 3 Alternatives dated December 17, 1996.  
Attached are Ohio EPA comments.

If you have any questions, please contact Kelly Kaletsky (937-285-6454) or me.

Sincerely,

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

- cc: Jim Saric, USEPA
- Terry Hagen, FERMCO
- Ruth Vandergrift, ODH
- Bob Geiger, PRC
- Manager, TPSS/DERR,CO
- Dave Ward, GeoTrans

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**FINAL EVALUATION OF SILO 3 RESIDUES ALTERNATIVES**

Revision A

**VOLUME 1**

- 1) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: General Comment Pg #: n/a Line #: n/a Code: C  
 Original Comment #:  
 Comment: What are the specific requirements for IP-2 containers for shipment?  
 Response:  
 Action:
- 2) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: ES Pg #: ES-1 Line #: n/a Code: C  
 Original Comment #:  
 Comment: The basis for the cost analysis does include the associated costs in the design of a full scale vitrification plant with the necessary design to accommodate Silo 3 wastes. In general, we do not agree with the cost comparison methods; regardless, we agree that a different method for handling Silo 3 wastes is warranted.  
 Response:  
 Action:
- 3) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.0 Pg #: 3-1 Line #: Para 1 Code: C  
 Original Comment #:  
 Comment: The comparative analysis section should specifically mention the alternative of removal, off-site treatment and disposal.  
 Response:  
 Action:
- 4) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.1.2 Pg #: 3-5 Line #: Para 2 Code: C  
 Original Comment #:  
 Comment: This section states the material that does not meet the WAC of the disposal facility will be reprocessed. How would a monolith and/or 55 gallon drum of concrete be reprocessed? Would this reprocessing pose a significant cost to the onsite facility?  
 Response:  
 Action:
- 5) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.3.3.2 Pg #: 3-20 Line #: Para 2 Code: C  
 Original Comment #:  
 Comment: Should lid heaters be included in the list of components that will need to be modified for future designs?

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Response:  
 Action:

- 6) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.3.4 Pg #: 3-25 Line #: Table 3-7 Code: C  
 Original Comment #:  
 Comment: The risks stated for intermodal transport of the wastes are higher for nearly every category listed in the table. What assumptions were used to calculate these risks? And, which of these assumptions caused these risks to be relatively high?  
 Response:  
 Action:
- 7) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.3.5.1 Pg #: 3-28 Line #: Para 4 Code: C  
 Original Comment #:  
 Comment: Please define "risk budget."  
 Response:  
 Action:
- 8) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.3.5.2 Pg #: 3-29 Line #: General Code: C  
 Original Comment #:  
 Comment: There is no discussion in this section about the cost associated for off-site treatment and disposal. Volume I of this report should give equal time to this alternative, since this is the volume which will be more widely read.  
 Response:  
 Action:
- 9) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 4.0 Pg #: 4-2 Line #: 13 Code: C  
 Original Comment #:  
 Comment: The radon flux listed under the stabilization column is very near the 20 pCi/m<sup>2</sup>-sec limit. Is this number an estimate, or have tests been conducted to verify that the radon flux from stabilization will be less than the regulatory limit.  
 Response:  
 Action:
- 10) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 4.0 Pg #: 4-3 Line #: 13 Code: E

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Original Comment #:

Comment: This footnote incorrectly references the regulatory limit for radon-222 flux as being from 50 CFR Subpart Q. Change to read 40 CFR Subpart Q.

Response:

Action:

## VOLUME 2

- 11) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 2.5 Pg #: 2-5 Line #: Para 2 Code: C  
 Original Comment #:  
 Comment: Off-site stabilization and disposal at a representative commercial disposal facility is listed as an alternative in the path forward section of this document. Why is it not included as an option in Volume 1?  
 Response:  
 Action:
- 12) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.2.1.1 Pg #: 3-20 Line #: 2 Code: C  
 Original Comment #:  
 Comment: If Silo 3 contents are best described as being dry and powdery, why is an auger and then a delumper/crusher needed for material removal from the silos?  
 Response:  
 Action:
- 13) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.2.1.2 Pg #: 3-28 Line #: 24 Code: C  
 Original Comment #:  
 Comment: What is the purpose of cooling the off-gas in the Venturi scrubber and then preheating it again in the off-gas filtration preheater?  
 Response:  
 Action:
- 14) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: B.2.3 Pg #: B-2-6 Line #: Para 3 Code: C  
 Original Comment #:  
 Comment: We do not agree that shipment by rail should be deleted from consideration. Provide detailed justification as to why this mode of transport should be deleted. FEMP is in the process of extensive rail work for transporting the waste pit materials, and it would seem that OU4 might be able

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to utilize these facilities also.

Response:

Action:

- 15) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: B.5.1.1.3 Pg #: B-5-2 Line #: Bullets              Code: C  
Original Comment #:  
Comment: One of the "EPA/Stakeholder concerns" is stated as being the ability for a commercial facility to be able to successfully treat the Silo 3 material. There is equal concern for the successful treatment of the Silo 3 material regardless of who does the treatment.  
Response:  
Action: