

582

3-409.4³

**TRANSMITTAL OF THE FINAL BOILER PLANT/WATER PLANT
IMPLEMENTATION PLAN AND COMMENT RESPONSES - (NOTE ONLY
RESPONSES ARE LOCATED HERE - SEE 3-402. FOR ACTUAL
IMPLEMENTATION PLAN)**

02/13/97

**DOE-0535-97
DOE-FEMP EPAS
3
RESPONSES**



Department of Energy

**Ohio Field Office
Fernald Area Office**

P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



FEB 13 1997

DOE-0535-97

**Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V - SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590**

**Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911**

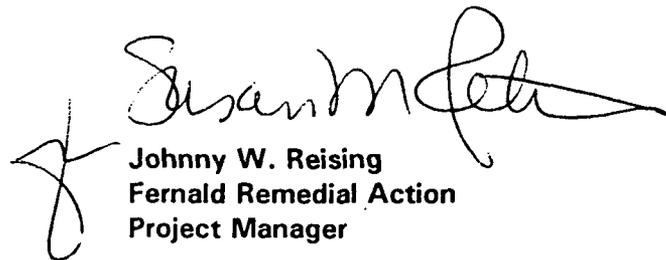
Dear Mr. Saric and Mr Schneider:

TRANSMITTAL OF THE FINAL BOILER PLANT/WATER PLANT IMPLEMENTATION PLAN AND COMMENT RESPONSES

The purpose of this letter is to transmit the final Boiler Plant/Water Plant Implementation Plan for Above-Grade Decontamination and Dismantlement. Also attached are responses to two United States Environmental Protection Agency (U.S. EPA) comments made on the draft final (December 1996) BP/WP Complex Implementation Plan, which was fully approved by the Ohio Environmental Protection Agency (OEPA) on December 30, 1996, and conditionally approved by the U.S. EPA on January 15, 1997.

If there are any questions concerning this document or the comment responses, our point of contact is John Trygier, (513) 648-3154.

Sincerely,


**Johnny W. Reising
Fernald Remedial Action
Project Manager**

FEMP:Trygier

Enclosure: As Stated

cc w/enc:

S. Fauver, EM-42/GTN
D. Govans, EM-42/GTN
G. Jablonowski, USEPA-V, 5HRE-8J
R. Baumier, TPSS/DERR, OEPA-Columbus
F. Bell, ATSDR
S. McLellan, PRC
D. Ward, GeoTrans
R. Vandegrift, ODOH
T. Clark, FDF/52-4
T. Hagen, FDF/65-2
C. Little, FDF/2
AR Coordinator, FDF/78
EDC, FDF/52-7

000002

Response to U.S. EPA Comments on the Boiler Plant/Water Plant
Complex Implementation Plan for Above-Grade
Decontamination and Dismantlement

Commenting Organization: U.S. EPA
Section #: 4.0
Original Specific Comment #: 5

Commentor: Saric
Page#: 40

Line #: NA

Comment: The original specific comment requested that the remediation schedule be revised to reflect a more realistic start date. The start date for field remediation has been changed to approximately 1 month later. However, the field remediation period has been shortened from 869 to 645 days. Some explanation of how 224 days were eliminated from this schedule should be added to the text.

Response: The field remediation duration was shortened as a result of completing Title II design activities. Specifically, the 869-day initial schedule was based on a *conceptual* estimate using the footprints and relative sizes of the structures. However, following Title II design activities, the field duration was shortened by 7½ months to 645 days based on a *detailed* estimate of the work by systems and areas of the facilities. This detailed estimate also incorporated process improvements; for example, BP/WP Complex structural steel is now planned to be cut primarily with hydraulic shears rather than a more labor-intensive technique (i.e., torch cutting). Please note that, per discussion and agreement with U.S. EPA on January 28, 1997, the text of the implementation plan has not been revised.

Commenting Organization: U.S. EPA
Section #: Appendix A
Original Specific Comment #: 1

Commentor: Saric
Page#: A-1

Line #: 15-17

Comment: The text states that sufficient process knowledge exists to allow any secondary waste to be contained and sent to on-site wastewater treatment plant for treatment. The text also indicates that sampling of secondary waste may be necessary. The text should be revised to state that contained secondary waste sampling may be necessary before the waste is sent to on-site wastewater treatment plant to ensure that the treatment plant can accept the waste stream.

Response: Agree; the text in Appendix A has been modified to state that sampling of wastewaters may be necessary before being sent for on-site treatment to ensure that the wastewater treatment plant can accept the wastewater stream.

000003