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COMMENTS DRAFT PLANT 9 IMPLEMENTATION PLAN

03/07/97

OEPA DOE-FEMP
4
COMMENTS

OhioEPA

State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

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March 7, 1997

RE: DOE FEMP
MSL 531-0297
HAMILTON COUNTY
COMMENTS DRAFT PLANT 9
IMPLEMENTATION PLAN

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

Dear Mr. Reising:

The Ohio Environmental protection Agency and the Ohio Department of Health, Bureau of Radiation Protection have completed our reviews of the draft Operable Unit 3 Integrated Remedial Action Thorium/Plant 9 Complex Implementation Plan for Above-grade Decontamination and Dismantlement. This letter provides as an attachment our comments.

If you have any questions, please contact Tim Hull or me.

Sincerely,

Tom Schneider for

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

cc: Jim Saric, U.S. EPA
Terry Hagen, FERMCO
Ruth Vandergrift, ODH
Mike Proffitt, DD&GW
Bob Geiger, PRC
Manager, TPSS/DERR,CO
Dave Ward, GeoTrans

(murphy(a)
partial
action response
to doe-0376-97
(10223)

DPLT9IMP.LTT

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Ohio Environmental Protection Agency Comments on the Draft Operable Unit 3 Integrated Remedial Action Thorium/Plant 9 Complex Implementation Plan for Above-Grade Decontamination and Dismantlement

General Comments

1) Commenting Organization: Ohio EPA Commentor: ODH
Section #: Pg #: Line #: Code:
Original Comment #:
Comment: A Radiological Requirements Plan which outlines the requirements that must be met by the remediation subcontractors is referenced throughout the document. ODH requests a copy of this plan for our reference.

Specific comments

2) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.3.2 Pg #: 11 Line #: 13 Code: C
Original Comment #:
Comment: The sentence states that water added for dust suppression will be dispositioned in the storm sewer. What assurance will DOE give that this water will not be contaminated?

3) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.4 Pg #: 18 Line #: 22 Code: c
Original Comment #:
Comment: The background air monitors are to be operated around the clock and analyzed weekly. The plan does not specify the duration of the baseline sampling. That is, it does not specify how many week long time intervals will be measured. The meaning of the adjective "supplemental" is unclear. Will the baseline monitors not be co-located with the compliance monitors?

4) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.4 Pg #: 18 Line #: 3 Code: c
Original Comment #:
Comment: This sentence is confusing. It is unclear what "potential emission sources were treated as being in their gaseous states" means.

5) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.4 Pg #: 18 Line #: 1 Code: c
Original Comment #:
Comment: It is not clear what source terms from Appendix B, Attachment B.I were input into the computer modeling. A more detailed description of the inputs to the model and how the modeling was specific to this complex would be helpful. If this information is available as an earlier submittal, please provide a reference.

6) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.4 Pg #: 17 Line #: 25 Code: c
Original Comment #:
Comment: The site-wide air monitoring program is currently being negotiated as part of NESHAPs compliance monitoring. Please discuss how changes in the site-wide monitoring plan (such as the re-location of fence-line monitors) would affect the monitoring for this project.

7) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.4 Pg #: 18 Line #: 28 Code: c
Original Comment #:
Comment: Please suggest a mechanism and schedule to report these data to the Ohio EPA. Weekly faxes of unvalidated monitoring results followed by written reports with the validated data are acceptable to Ohio EPA.

8) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.4 Pg #: 18 Line #: 15 Code: c
Original Comment #:
Comment: The discussion of activities and doses presented here seems to be limited to uranium to the exclusion of thorium. Do the historical trends for thorium also show a limited dose? This section does not explicitly state that thorium will be monitored.

9) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.4 Pg #: 19 Line #: Figure 2-1 Code: c
Original Comment #:
Comment: Please provide a scaled drawing out to the fenceline.

10) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.4 Pg #: 20 Line #: 2 Code:
Original Comment #:
Comment: Was this sentence intended to mean "more than twice as high"? Regardless of the preferred phrasing, a brief elaboration of how to determine the factor of two increase over background is desirable.

11) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Appendix B Pg #: B-1 Line #: 5 Code: c
Original Comment #:
Comment: This scrap metal disposition analysis was limited to structural steel. Was an evaluation performed for copper, stainless steel or other metals in addition to structural steel?

12) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Appendix B Pg #: Table B-1 Line #: Code:
Original Comment #:
Comment: For performance measures H.) Public Health Impacts and I.) Worker Safety Impacts the term "Facilities" is used instead of "Fatalities".
A more substantive comment about these two performance measures is their ineffectiveness in distinguishing between the alternatives. Given that these measures were determined quite early in the presentations to the Stakeholders to be poor distinguishers between the alternatives, it isn't helpful to carry them through the analysis. They are more confounding issues that take attention away from more sensitive performance measures that do distinguish between alternatives. We acknowledge the difficulty of reconciling the subjective value we all place on safety and health (a very high number) with the utility of these two performance measures to distinguish between the alternatives (a much lower number). An easy, obvious way out is to choose to weigh these two measures very low but this conflicts with most people's values. Perhaps a narrative discussion in the text that explains why these two measures will not used in the future could be incorporated into the next presentation to the Stakeholders.

13) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Appendix B Pg #: Table B-2 Line #: Code: c
Original Comment #:
Comment: The weighing scheme presented in Table B-2 appears to be reflect the inputs received from the stakeholders for the Plant 4 Complex. Will these weights remain standardized or will additional stakeholder input be sought? What are the criteria to be used to decide whether to update the weights of the performance measures?
A similar comment is also appropriate for the subjective criteria. What factors will be considered in evaluating whether the stakeholders should be asked to reevaluate performance measures D through G?

14) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Appendix B Pg #: Line #: Code:
Original Comment #:
Comment: The analytical phase of the Methodology was started, but the results were not calculated and no ranking of the alternatives was completed. It is Ohio EPAs expectation that when the methodology is finalized, it is actually used as a tool to assist the decision-makers. In future Implementation plans (and the final version of this Plan if possible) we expect enough detailed information about the costs, subjective rankings, and the weighing criteria to be able to evaluate whether the Methodology was applied as part of a good-faith effort to consider alternatives to disposal in the OSDF.