



State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

December 2, 1997

RE: DOE FEMP  
MSL 531-0297  
HAMILTON COUNTY  
DRAFT SILO 3 REQUEST FOR  
PROPOSAL

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 document Draft Request for Proposal for the Silo 3 Waste Project dated November 6, 1997. Please find attached Ohio EPA's 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, FDF
- Ruth Vandegrift, ODH
- Frances Barker, TetraTech EM Inc.
- Manager, TPSS/DERR,CO
- Dave Ward, GeoTrans

OHIO EPA COMMENTS ON SILO 3 DRAFT REQUEST FOR PROPOSAL

1) Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: General Comment Pg #: Line #: Code: C  
Original Comment #:

Comment: DOE, through the RFP, should encourage the use of materials and equipment that are recyclable, reusable or easily decontaminated in the Silo 3 project. Generation of materials that may need to be disposed of in the on-site disposal facility should be kept to an absolute minimum.

Response:  
Action:

2) Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: General Comment Pg #: Line #: Code: C  
Original Comment #:

Comment: The RFP should be revised to be consistent with the approved ESD concerning Silo 3 material disposal location. The RFP should employ the language from the ESD which states, "Off-site disposal at either the NTS or an appropriately-permitted Commercial Disposal Facility that complies with the CERCLA 'offsite rule' (40 CFR 300.440)."

Response:  
Action:

3) Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: C.1.5 Pg #: C.1-13 Line #: Code: C  
Original Comment #:

Comment: The italicized section and other associated text regarding USEPA's position on off-site treatment should be deleted. USEPA, through the approval of the ESD, has finalized their position regarding off-site treatment. The approved ESD states, "The treatment portion of the alternate remedy may be accomplished through either onsite treatment at the FEMP to meet disposal facility WAC, or pretreatment onsite as required to reduce dispersability of thorium-bearing particulates and render the waste acceptable for transportation, followed by transportation to an appropriately permitted offsite facility for treatment using Chemical Stabilization/Solidification or a polymer-based encapsulation process to meet disposal facility WAC."

Response:  
Action:

4) Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: C.3.2.1.2 Pg #: C.3-3 Line #: Code: C  
Original Comment #:

Comment: The text states that FDF will retain responsibility for the overall silo integrity during the remediation process. Will FDF be responsible if the silos are damaged by the contractor during remediation? Is there a contingency plan in place in case there is silo damage or failure?

Response:  
Action:

5) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: C.3.2.1.6 Pg #: C.3-5 Line #: Code: C

Original Comment #:

Comment: Please describe how construction deviations will be handled by FDF. Will this be accomplished through design Change Notices? Include all parties to be notified of deviations i.e. regulators, stakeholders, etc.

Response:

Action:

6) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: --- Pg #: C.3-10 Line #: --- Code: C

Original Comment #:

Comment: Page C.3-10 is printed twice.

Response:

Action:

7) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: C.4.6.1 Pg #: C.4-8 Line #: Code: C

Original Comment #:

Comment: Will there be a penalty assessed to the contractor if they are the cause for a missed deadline of milestone?

Response:

Action:

8) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: C.5.1.1.3.1 Pg #: C.5-10 Line #: Code: C

Original Comment #:

Comment: The text states that a stack test **may** be required to demonstrate the effectiveness of control equipment. Ohio EPA agrees with this statement, but adds that continuous isokenetic sampling will be required throughout the operation of the facility.

Response:

Action: