UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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APR 02 1998

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

REPLY TO THE ATTENTION OF: SRF-5J

Subject: Technical Review Comments on *Sewage Treatment Plant Complex Implementation Plan for Above-grade Decontamination and Dismantlement*

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the above-referenced document as part of its oversight activities for Operable Unit 3 (OU3) of the Fernald Environmental Management Project (FEMP). The document was submitted to the U.S. EPA by the United States Department of Energy (U.S. DOE) in March 1998.

The document provides a general remediation approach for the Sewage Treatment Plant Complex at FEMP and describes the component-specific remediation tasks, remediation schedule, and management responsibilities. Appendixes A through E of the document respectively present the proposed sampling approach, evaluation of material disposition alternatives, project work scope conditions and specifications, design drawings, and photographs of the components to undergo decontamination and dismantlement (D&D).

U.S. EPA's review focused on (1) assessing whether DOE's D&D approach conforms with standard engineering practices and (2) evaluating U.S. DOE's overall approach to implementing and managing the D&D activities. The general remediation approach appears to be reasonable, and the performance specifications conform to standard engineering practices. However, some portions of the document are unclear and require revision. U.S. EPA's general and specific review comments are enclosed.

Please contact me at (312) 886-4591 if you have any questions.

Sincerely,

E Jablonowski

Gene Jablonowski
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
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ENCLOSURE

TECHNICAL REVIEW COMMENTS ON
"SEWAGE TREATMENT PLANT COMPLEX IMPLEMENTATION PLAN
FOR ABOVE-GRADE DECONTAMINATION AND DISMANTLEMENT"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

(Two Pages)

TECHNICAL REVIEW COMMENTS ON "SEWAGE TREATMENT PLANT COMPLEX IMPLEMENTATION PLAN FOR ABOVE-GRADE DECONTAMINATION AND DISMANTLEMENT"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENTS

Commenting Organization: U.S. EPA Commentor: U.S. EPA
Section #: Not Applicable (NA) Page #: NA Line #: NA
Original General Comment #: 1
Comment: As part of the Operable Unit (OU) 3 decontamination and dismantlement (D&D) project at the Fernald Environmental Management Project, the U.S. Department of Energy (DOE) researched and evaluated D&D technologies for incorporation in OU3 remedial activities. It is not clear whether DOE is incorporating or promoting use of D&D technologies for the Sewage Treatment Plant (STP) Complex. DOE should revise the implementation plan to include a section that discusses potential or planned applications of D&D technologies.

Commenting Organization: U.S. EPA Commentor: U.S. EPA
Section #: 5.0 Page #: NA Line #: NA
Original General Comment #: 2
Comment: Section 5.0 provides information regarding DOE's management of the site support contractor. The recent problems experienced with subcontractor management during OU3 D&D activities raises a concern regarding the effectiveness of DOE's field oversight of OU3 site support contractors. The implementation plan should be revised to provide additional detail regarding the frequency of DOE field oversight and DOE efforts to prevent subcontractor performance problems (see Original Specific Comment No. 5).

Commenting Organization: U.S. EPA Commentor: U.S. EPA
Appendix #: B Page #: NA Line #: NA
Original General Comment #: 3
Comment: Appendix B addresses recycling and reuse of structural steel (accessible metals) associated with the STP Complex. First, no information is provided regarding whether recycling and reuse alternatives exist for other types of STP Complex materials. Such information should be provided. Second, the text indicates that disposal alternatives for structural steel do not meet the threshold-phase cost criteria based on "recent" or "current" Plant 4 Case Study cost data. The cost data for the Plant 4 Case Study was presented at a public meeting on July 8, 1997. DOE should provide the actual date of the cost data and not the date that it was presented at a public meeting. The cost data is likely to be over 1 year old by the time STP Complex D&D activities are initiated and will require validation. Third, the text at the end of the appendix indicates that a re-evaluation of the disposition alternatives would be considered should vendor or market conditions change significantly prior to disposal of the structural steel in the On-Site Disposal Facility. DOE should confirm that it will investigate and evaluate recycling and reuse alternatives for structural steel and other STP Complex materials before STP Complex D&D activities begin. The text should be revised to address these issues.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: U.S. EPA
Section #: 1.2 Page #: 2 Line #: 19 and 20
Original Specific Comment #: 1
Comment: The text discusses the scope of work for the STP Complex. The text indicates that Component 25D is not included in the scope of the plan because 75 percent of the component is below grade. DOE also indicates that Component 25D is included in the scope of the Area 1, Phase II (A1PII) excavation project. It is not clear why the 25 percent above-grade portion of the component is not included in the scope of the plan, nor is it clear how the A1PII excavation project would address D&D of the above-grade portion of the component. The text should be revised to address these issues.

Commenting Organization: U.S. EPA Commentor: U.S. EPA
Section #: 1.2 Page #: 2 Line #: 33
Original Specific Comment #: 2
Comment: The text states that DOE will provide notification to the regulatory agencies of any significant changes to the design before its implementation. DOE should clarify and provide an example of what is meant by a significant change in terms of the STP Complex.

Commenting Organization: U.S. EPA Commentor: U.S. EPA
Section #: 2.3.4 Page #: 11 Line #: 20 to 27
Original Specific Comment #: 3
Comment: The text refers to commingling of OU3 debris categories A, B, D, and E. Commingling of debris is acceptable contingent upon DOE's ability and commitment to track the quantities of the various waste categories in interim storage.

Commenting Organization: U.S. EPA Commentor: U.S. EPA
Section #: 4.0 Page #: 35 Line #: 11 to 13
Original Specific Comment #: 4
Comment: The text states that significant delays in STP startup would likely necessitate reconsideration of the STP Complex D&D project milestones for completion of field activities and submittal of the project completion report. DOE should revise the text to state that it will notify the regulatory agencies of any proposed schedule modifications.

Commenting Organization: U.S. EPA Commentor: U.S. EPA
Section #: 5.0 Page #: 37 Line #: NA
Original Specific Comment #: 5
Comment: The text indicates that the DOE Fernald Area Office will conduct field oversight to monitor construction, engineering, quality assurance, and health and safety activities. In light of recent subcontractor problems at OU3, DOE should revise the text to specify the frequency of its field oversight and to clarify how it will prevent subcontractor performance problems and schedule delays.