



State of Ohio Environmental Protection Agency

Southwest District Office

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FEB 17 1998

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George V. Voinovich
Governor

April 14, 1998

RE: DOE FEMP
MSL 531-0297
HAMILTON COUNTY
SILOS 1 & 2 AWR SOW

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 Silos 1 and 2 Accelerated Waste Retrieval Project Statement of Work dated March 23, 1998. 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

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**OHIO EPA COMMENTS ON SILOS 1 AND 2 AWR PROJECT
STATEMENT OF WORK**

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: Line #: Code: C
 Original Comment #:
 Comment: Please provide information regarding how FDF will assure that the AWR project contractor will adhere to the SOW and other requirements. Will this be accomplished through inspections, documentation, meetings, etc.?
 Response:
 Action:
- 2) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: Line #: Code: C
 Original Comment #:
 Comment: During the procurement process, preference should be shown to vendors that will construct facilities that are easily decontaminated and demolished with minimal waste generation.
 Response:
 Action:
- 3) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: Line #: Code: C
 Original Comment #:
 Comment: When selecting a contractor, DOE should show preference to vendors that can demonstrate systems that minimize any and all emissions, i.e. air (radon), wastewater, etc.
 Response:
 Action:
- 4) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.16.2.1 Pg #: 6-8 Line #: Code: C
 Original Comment #:
 Comment: The text states that flush water that cannot be treated at the AWWT will be treated by the contractor prior to discharge. Will this open the possibility to the construction of an additional facility, however small, by the contractor to treat possible wastewater? Please provide further information regarding the generation and treatment of potential wastewater including coordination of flow with AWWT capacity.
 Response:
 Action:

5) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.1.7 Pg #: 6-62 Line #: Code: C

Original Comment #:

Comment: DOE should consider including the policy stating a worker's right to stop work in this section.

Response:

Action: