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Department of Energy

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APR 22 1998

DOE-0699-98

Mr. Gene Jablonowski, Remedial Project Manager
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. Jablonowski and Mr. Schneider:

RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE SILO 3 PROJECT, DRAFT REQUEST FOR PROPOSAL, REVISION D

Enclosed are the responses to the comments provided by the Ohio Environmental Protection Agency (OEPA) on the above referenced subject. The Request for Proposal (RFP) is currently with the Department of Energy, Fernald Environmental Management Project (DOE-FEMP) for review and consent. The RFP will be issued as soon as the DOE-FEMP completes the review and upon consent.

If you have any questions, please contact Nina Akgündüz at (513) 648-3110.

Sincerely,

Johnny Reising

Johnny W. Reising,
Fernald Remedial Action
Project Manager

FEMP:Akgündüz

Enclosure: As Stated

Recycled and Recyclable

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cc w/enc:

N. Hallein, EM-42/CLOV
J. Saric, USEPA-V, SRF-5J
R. Beaumier, TPSS/DERR, OEPA-Columbus
T. Schneider, OEPA-Dayton (total 3 copies of enc.)
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
F. Barker, Tetra Tech
T. Hagen, FDF/65-2
J. Harmon, FDF/90
D. Paine, FDF/52-4
K. Wintz, FDF/20
AR Coordinator, FDF/78

cc w/o enc:

A. Tanner, DOE-FEMP
R. Heck, FDF/2
S. Hinnefeld, FDF/2
EDC, FDF/52-7

RESPONSES TO THE COMMENTS ON THE DRAFT SILO 3 RFP, REV. D

Commenting Organization: Ohio EPA Commentor: OFFO
Section #: C.3.2.3.3 Page #: C.3-10 Line #: N/A Code: C
Original Comment #: 6

Comment: Please supply a copy of page C.3-11, which was omitted from the original document.

Response: Agree.

Action: Attached is a copy of page C.3-11, which was inadvertently omitted, from the Draft Silo 3 Project Request for Proposal, Revision D.

Commenting Organization: Ohio EPA Commentor: OFFO
Section #: C.3.2.3.3 Page #: C.5-10 Line #: N/A Code: C
Original Comment #: 8

Comment: Ohio EPA believes that based upon our understanding of the Silo 3 constituents and the strong public concern regarding emissions and monitoring that continuous isokinetic sampling could be required. Ohio EPA also understands that this issue is most appropriately addressed in the RD.

Response: Agree. The need to install isokinetic monitoring equipment, in addition to best available technology (BAT), will be determined based upon a comparison of the effective dose equivalent developed from vendor supplied emission estimates in conjunction with site source data, with the National Emission Standards for Hazardous Air Pollutants (NESHAPs) threshold for installation of continuous monitoring equipment (0.1 mrem/yr).

Continuous isokinetic monitoring would only be mandatory throughout operation if emission modeling estimates would exceed the threshold value for effective dose equivalent (0.1 mrem/yr) established under 40 CFR Part 61 Subpart H NESHAP for control of radioactive particulate released from a point source.

Action: The Contractor's Remedial Design Package shall describe the equipment and processes necessary to ensure that emissions meet applicable or relevant and appropriate requirements and as low as reasonably achievable requirements. The plan shall also describe process controls and any plans for stack or other air monitoring. The Remedial Design Package will be submitted to both the United States Environmental Protection Agency (U.S. EPA) and the Ohio EPA for review and approval. The Remedial Design Package must be approved by the U.S. EPA prior to the Contractor beginning operations.

C.3.2.3.3 Dismantlement

FDF will review the Contractor's dismantlement plan and make a final determination whether any dismantlement activity effects the structural integrity of Silo 3. No dismantlement activity shall be performed without the written approval of FDF.

Dismantlement shall include the following activities:

- Removal of all equipment, piping, conduit, cable trays, etc.;
- Demolition of all permanent structures erected by the Contractor; and
- Sizing and segregation of all removed and demolished material in accordance with FDF direction.

Concrete foundations, portions of Silo 3, and attachments to Silo 3 whose partial or entire removal could jeopardize the structural integrity or the ability to maintain confinement of the silo shall NOT be demolished.

C.3.2.4 Demobilization Phase

Demobilization shall consist of removal of all the Contractor's temporary facilities and equipment and documentation close out.

C.3.2.4.1 Authorization to Demobilize

Upon completion of dismantlement activities, the Contractor shall request in writing from FDF, written approval to begin demobilization activities.

Upon completion of dismantlement work, proper treatment and disposal of waste, and completion of any necessary site restoration activities, FDF will provide written approval for the Contractor to demobilize.

C.3.2.4.2 Removal of Temporary Facilities

The Contractor shall remove from the FEMP all temporary facilities and equipment installed under this contract. All items leaving the site must have a radiological survey, and otherwise meet the criteria for release in this contract, including those requirements identified in Attachment J.3.4.

Support of demobilization activities shall be performed by FAT&LC and GCBCTC, as required by the Labor agreement and as specified in the Labor Relations/Work Force Utilization Plan.

C.3.2.4.3 Site Restoration

The Contractor shall restore the physical conditions within the Silo 3 Work Zone Area and