



State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

May 1, 1998

RE: DOE FEMP  
COMMENTS: STP COMPLEX  
IMPLEMENTATION PLAN

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 reviewed DOE's March 2, 1998 submittal, Implementation Plan for Above-Grade Decontamination and Dismantlement of the Sewage Treatment Plant Complex. The following comments provide our concerns with the document:

- 1) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: General Comment                      Pg #:    Line #:                      Code: M  
Original Comment #:  
Comment: Ohio EPA does not believe that the OSDF is the proper disposition location for the incinerator refractory brick. Ohio EPA believes the incinerator is most appropriately characterized as process related equipment. The contents of which should be dispositioned off-site. The fact that no decontamination of the bricks is possible, as stated in the plan, provides further basis for concluding the material should be disposed off-site.
- 2) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: General Comment                      Pg #:    Line #:                      Code: M  
Original Comment #:  
Comment: The issue of the refractory brick brings up a similar unresolved issue regarding the refractory brick from the Plant 4 furnaces. The September 197, Plant 4 final report states, Final disposal will be resolved in the near future and will be reported to the USEPA and Ohio EPA. Please provide an update on this waste stream.
- 3) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 1.2                      Pg. #: 3                      Line #: 3-5                      Code: C  
Original Comment #:  
Comment: Please define what is meant by a significant change that will require agency review and approval.

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- 4) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 2.3.4                      Pg #: 14                      Line #: 14-17                      Code: C  
Original Comment #:  
Comment: DOE must provide more detail regarding the temporary stockpiling. Details regarding maximum duration, stormwater controls, etc. need to be included.
  
- 5) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 2.4                      Pg #: 19                      Line #:19-27                      Code: C  
Original Comment #:  
Comment: The IEMP air monitor station AMS-3 is located NNE of the STP. The MEI was modeled to be 715 m SSE of the STP. An air monitor should be placed near the MEI.
  
- 6) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.5.3                      Pg. #: 26                      Line #: 5                      Code: C  
Original Comment #:  
Comment: Typo, second word of this line.
  
- 7) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 3.5                      Pg. #: 32                      Line #: 24-25                      Code: C  
Original Comment #:  
Comment: The Skeet Range Building is located on Figure D-10, not D-9 as indicated. Please correct.
  
- 8) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 3.6                      Pg. #: 33                      Line #: 29-30                      Code: C  
Original Comment #:  
Comment: The removal of the electrical cable was scheduled for April 1998. Was the schedule met? If not, please correct.
  
- 9) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: Appendix A                      Pg. #: A-2                      Line #: 25-27                      Code: C  
Original Comment #:  
Comment: Please site the reference which states that 25% of the workers should be monitored with occupational air samplers when entering a radiological controlled area
  
- 10) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: Appendix C, Mob, Demob...                      Pg #: 4                      Line #: G(1)                      Code: C  
Original Comment #:  
Comment: The use of hay bales as storm water controls is not acceptable. Ohio EPA has

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commented on this in numerous other documents and was under the impression this had been a site-wide change. The text should be revised.

- 11) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: Appendix C, Structural Steel Dis. Pg #: 2                      Line #: 2                      Code: C  
 Original Comment #:  
 Comment: The use of Category 1 & 2 types of steel may lead to confusion with OSDF Category 1 & 2 type materials. Ohio EPA recommends use of different terminology for steel segregation.
  
- 12) Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: Appendix D                      Pg. #:                      Line #:                      Code: C  
 Original Comment #:  
 Comment: Several diagrams are difficult to read due to the poor copies, i.e., Figure D-2, Figure D-6, D-7, etc.

If you have any questions, please contact me.

Sincerely,



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

- cc: Jim Saric, U.S. EPA
- Terry Hagen, FDF
- Ruth Vandergrift, ODH
- Mark Shupe, HSI GeoTrans
- Francie Barker, Tetra Tech EM Inc.
- Manager, TPSS/DERR,CO