



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich  
Governor

June 12, 1998

RE: DOE FEMP  
DISAPPROVE: R1C 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 26, 1998 submittal, Comment Response Revisions to the Draft Implementation Plan for Above-Grade Decontamination and Dismantlement of the Sewage Treatment Plant Complex. Ohio EPA finds it troubling that in the referenced cover letter DOE asks for approval by March 26, the same day the document was signed by DOE. Ohio EPA recommends DOE reevaluate its project planning to be more consistent with the standard regulatory review schedule. 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 #: 1  
Comment: Ohio EPA does not agree with DOE's position regarding the refractory waste from within the STP Incinerator. The elevated contamination levels associated with these bricks show it is most like process related wastes. Ohio EPA believes a decision to disposition this material off site is most appropriate. The safety and cost issues associated with inspecting each brick for process residue out weigh the costs associated with dispositioning less than 2 yd<sup>3</sup> off-site. Visual inspection of the brick will be difficult as attached residues would likely be covered in carbon and thus difficult to discern. Finally, the recent Tc-99 investigation of the STP reveals an as yet undefined source for the Tc-99 contamination. It is likely the incinerator contributed to this contamination and that refractory may contain significant quantities of Tc-99. Therefore, if DOE insists on placing the material into the OSDF, Ohio EPA believes additional sampling of the refractory followed by a comparison to the evaluation of high Tc-99 areas made in the OU3 RI/FS is appropriate.
  
- 2) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: General Comment                      Pg #:    Line #:                      Code: M  
Original Comment #: 4

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Comment: DOE's response to this comment and subsequent revised text fail to provide sufficient detail regarding storm water controls for debris piles associated with the project. As requested in Ohio EPA's original comment the document must include the maximum duration for the pile to be in place, the plans must specify the location of the pile and all storm water controls to be implemented. Simply assuming the material has been encapsulated is insufficient.

3) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #:      Pg #:                      Line #:                      Code: M  
 Original Comment #: 5

Comment: It is interesting to note that since Ohio EPA made the original comment recommending project specific air monitoring, DOE's dose estimates have gone up over 3 orders of magnitude. Yet, DOE still proposes no monitoring at the MEI. Considering this is likely to be the most contaminated remediation at the property fence line, DOE's decision is dismayng. Ohio EPA expected that DOE would want to collect data at the MEI to demonstrate to the public the effectiveness of control activities. Ohio EPA reiterates our recommendation that DOE conduct project specific air monitoring at the MEI.

Finally, DOE should note that Ohio EPA will have significant concerns with this years' evaluation of the IEMP. DOE led Ohio EPA and the public to believe that project specific air monitoring would be conducted, yet to date we have seen no significant effort to conduct such monitoring.

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