



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

June 16, 1998

RE: DOE FEMP
HAMILTON COUNTY
DISAPPROVAL - OUI
TRANSPORTATION &
DISPOSAL 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 received DOE's document Transportation and Disposal Plan for Operable Unit 1 dated April 24, 1998. Without a selected disposal facility, the document obviously lacks needed detail. Ohio EPA recommends resubmittal following selection of a PCDF. Attached are Ohio EPA's comments.

If you have any questions, please contact me at 937-285-6466.

Sincerely,

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

- cc: Jim Saric, USEPA
- Terry Hagen, FDF
- Ruth Vandegrift, ODH
- Frances Barker, PRC
- Manager, TPSS/DERR,CO
- Mark Shupe, GeoTrans

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**OEPA COMMENTS - TRANSPORTATION AND DISPOSAL PLAN FOR OPERABLE
UNIT 1**

1) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: Line #: Code: C
 Original Comment #:

Comment: Because a decision has not been made regarding the final disposition of the OU1 waste, DOE should resubmit this disposal and transportation plan after a contract has been negotiated with a permitted CDF. DOE should also include transportation and disposal plans for any off-spec waste that may have to be transported to NTS. A route map should also be included in this document.

Response:

Action:

2) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: Line #: Code:
 Original Comment #:

Comment: This plan is designated a transportation and disposal plan but offers very little regarding disposal. The plan should be developed further to include the disposal location, travel routes including any stop over locations, estimated time en route, and radiological emergency response contacts along the transportation route.

Response:

Action:

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

Comment: To the extent possible, the transportation and disposal plan should include a contingency plan in the event that a rail car were rejected at the disposal facility. Would it have to return to Fernald or could it be further characterized and possibly rerouted from the disposal facility?

Response:

Action:

4) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.5.1 Pg #: 2-5 Line #: Code: C
 Original Comment #:

Comment: What is the future of the gondola cars after the completion of the transportation of OU1 wastes?

Response:

Action:

5) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.5.1 Pg #: 2-5 Line #: Code: C

Original Comment #:

Comment: The text states that a procedure will be developed for assembling the unit train paperwork package. In what document will this procedure be included?

Response:

Action:

6) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.5.2 Pg #: 2-6 Line #: Code: C

Original Comment #:

Comment: OEPA strongly recommends that DOE incorporate lessons learned from the waste shipment leak in Kingman, Arizona into the transportation plan for OU1 wastes. One of the logistical lessons learned resulted in the need for a more comprehensive plan in deploying support teams when an incident has occurred away from the site. This plan should be in place prior to any OU1 waste shipments as well as any shipments from the site utilizing other modes of transportation.

Response:

Action:

7) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 4.3.1 Pg #: 4-2 Line #: Code: C

Original Comment #:

Comment: The text states that pre-operational inspections will include the monitoring of sand. Please explain the role of sand in the operation of the locomotives.

Response:

Action:

8) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 4.3.2 Pg #: 4-2 Line #: Code: C

Original Comment #:

Comment: Please describe what contingency plans DOE has in place in case of a malfunction of a gondola rail car or locomotive while en route to the disposal facility.

Response:

Action:

9) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 7.4.2 Pg #: 7-2 Line #: Code: C

Original Comment #:

Comment: OEPA recommends that an additional operational scale model of the site rail infrastructure be made available at stakeholder meetings. This working model will be an excellent communications tool in explaining the loading and transportation process.

Response:

Action: