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JUN 25 1998

DOE-0907-98

**Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590**

Dear Mr. Saric:

**OPERABLE UNIT 1 TRANSPORTATION AND DISPOSAL PLAN - TRANSMITTAL OF
RESPONSE TO THE U. S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS**

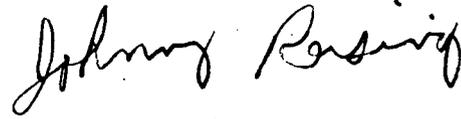
This letter transmits the Department of Energy's (DOE) responses to the U.S. Environmental Protection Agency (U.S. EPA) comments received May 29, 1998, with the conditional approval of the Transportation and Disposal Plan for Operable Unit 1 (OU1). In accordance with agreement via teleconference call with you and Mr. Dave Lojek on June 17, 1998, a submittal of a revised Plan document incorporating these comments will be withheld at this time, pending DOE's identification of the final commercial disposal facility. This is also consistent with Mr. Tom Schneider's recommendation made June 16, 1998, in transmittal of the OEPA comments on the Plan.

Our project schedules indicate that the commercial waste disposal contract must be awarded by the Fall of 1998 to support the waste shipping needs for initiating waste pit remediation as regulatorily required by March 1, 1999. Thus, we anticipate submitting the revised Plan in this general time frame, within 30 days of award of that contract.

The Waste Pit Remedial Action Project - OU1, is currently on schedule to achieve its regulatory milestones. As you are aware, however, the lawsuit filed by Waste Control Specialists (WCS) and the resulting injunction which effectively precludes the DOE from entering into commercial low level waste disposal contracts, continues to be a projected future vulnerability in the OU1 project.

If you have any questions regarding this subject, please contact Mr. Dave Lojek at (513) 648-3127.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Lojek

Enclosure: As Stated

cc w/enc:

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RESPONSES TO U.S. EPA TECHNICAL REVIEW COMMENTS ON THE
TRANSPORTATION AND DISPOSAL PLAN FOR OPERABLE UNIT 1
RECEIVED MAY 29, 1998

GENERAL COMMENT

Commenting Organization: U.S. EPA
Section#: Not Applicable (NA) Page#: NA
Original General Comment #: 1

Commentor: Saric
Line#: NA

Comment: In accordance with the standard format of Fernald Environmental Management Project documents, the transportation and disposal plan (TDP) should be revised to include line numbers for easy referencing of the text.

Response: Comment Acknowledged. DOE agrees that line numbers should be included in the plan for easy referencing of the text.

Action: The Transportation and Disposal Plan has been revised to include line numbers.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA
Section#: 2.2 Page#: 2-1
Original Specific Comment #: 1

Commentor: Saric
Line#: NA

Comment: The text describes the primary rail route from Shandon Yard to the commercial disposal facility (CDF) only. However, Item 6 of Section 1.2 on Page 1-1 of the TDP indicates that waste can be disposed of in the CDF or the U.S. Department of Energy's Nevada Test Site (NTS). The TDP should therefore be revised to describe the primary rail route to the NTS as well as the CDF.

Response: Comment Acknowledged. Because the Nevada Test Site (NTS) currently has no rail service, material required for disposition to NTS will be transported by truck using the established Fluor Daniel Fernald (FDF) Waste Management Program. Details of the transportation route to NTS is provided in PL-3043, FEMP Transportation Emergency Plan, Revision 1, page ES-5. However, shipments of waste to NTS are outside the scope of this plan.

Action: Section 1.2 on page 1-2 has been revised to state that "This plan covers only waste destined for a CDF. Waste identified for shipment to NTS, estimated at less than one percent of the total waste volume, will be handled under the FDF existing Waste Management Program and is therefore outside the scope of this document."

Commenting Organization: U.S. EPA
 Section#: 2.3.2 Page#: 2-2
 Original Specific Comment #: 2

Commentor: Saric
 Line#: NA

Comment: The text refers to Figure 2-1 as a photograph of the Okeana Trestle before the upgrade and to Figure 2-2 as a photograph of the current condition of the trestle. However, the photographs appear to be reversed in order. Either the text should be revised to correctly refer to the photographs or Figure 2-1 should be made Figure 2-2 and vice versa.

Response: Comment Acknowledged. However, the two figures are properly positioned in the text. Figure 2-1 is the correct photograph representing the Okeana Trestle as it appeared in the early stages of the upgrade as the wooden support structures were being replaced with steel. Figure 2-2 is the correct photograph which represents the completion of the structural improvements made to the trestle.

Action: The text has been revised to state that "Figure 2-1 is a photograph representing the Okeana Trestle as it appeared in the early stages of the upgrade as the wooden support structures were being replaced with steel. Figure 2-2 is a photograph which represents the completion of the structural improvements made to the trestle."

Commenting Organization: U.S. EPA
 Section#: 3.2.2 Page#: 3-1
 Original Specific Comment #: 3

Commentor: Saric
 Line#: NA

Comment: The text states that the railcars will be radiologically surveyed. However, the equipment and procedure for the radiological survey and the criteria to be used to interpret survey results to determine the need for decontamination are not discussed in the TDP. This information is also not included in the remedial design package. The TDP should be revised to include the abovementioned information.

Response: The process for preparing a railcar for off-site shipment involves the use of all reasonable decontamination efforts necessary to remove contamination from the railcar as needed to meet the established radiological release requirements. If radiological survey results show that the established radiological limits have not been achieved, further decontamination and surveying will be performed until established radiological limits are met. If the limits cannot be met, the railcar will not be released from the site.

Action: The TDP has been revised to state that "The cars will then be radiologically surveyed to the established radiological release limits (and decontaminated as necessary) prior to being delivered to FEMP Rail Operations for storage in the North Rail Yard awaiting unit train staging and shipment."

Commenting Organization: U.S. EPA
Section#: 3.3.1 Page#: 3-3
Original Specific Comment #: 4

Commentor: Saric
Line#: NA

Comment: The text refers to procedures for railcar activities yet to be developed. The text should be revised to state that, when available, these procedures will be submitted to the regulatory agencies.

Response: Disagree. The Standard Operating Procedures (SOPs) will be developed consistent with commitments contained in the TDP. However, as the project progresses, the SOPs will be regularly reviewed and updated as appropriate. Therefore, the project has no plans for releasing SOPs pursuant to the Amended Consent Agreement.

Action: No action required.

Commenting Organization: U.S. EPA
Section#: 3.3.3 Page#: 3-4
Original Specific Comment #: 5

Commentor: Saric
Line#: NA

Comment: The text refers to an Alternative Remedial Action Subcontracting Approach (ARASA) decontamination area that is not shown in any of the figures included in the TDP. The TDP should be revised to include a site layout showing the location of the ARASA decontamination area and a description of this area.

Response: Comment Acknowledged. The ARASA decontamination area will be located north of the Railcar Loadout and Scale Facility. Refer to the following drawings in the Remedial Design Package: drawing # M-90-02-001, and drawing # M-35-02-001.

Figure 3-1 of the TDP was developed for Rail Operations facility references only. ARASA facilities, such as the decontamination area, will be included in ARASA project submittals.

Action: The TDP has been revised to state that "If a car is contaminated, segregation and decontamination of that car will be initiated by moving the car to the ARASA decontamination area, located north of the Railcar Loadout and Scale Facility."

Commenting Organization: U.S. EPA
Section#: 5.4 Page#: 5-3
Original Specific Comment #: 6

Commentor: Saric
Line#: NA

Comment: Lines 4 and 5 in Paragraph 1 of Page 5-3 refer to a radiological waste bag. However, the text does not specify storage and disposal procedures for this bag. The text should be revised to provide this information.

Response: Agree. All radiological waste bags containing used personal protective equipment and other similarly generated radiological waste will be properly handled and disposed of in accordance with existing approved site guidance that addresses control of such materials.

Action: The TDP narrative has been revised to include the following statement: "All radiological waste bags will be properly handled and disposed of in accordance with existing site guidance that addresses control of such materials."

Commenting Organization: U.S. EPA

Commentor: Saric

Section#: 7.4.2.1

Page#: 7-2

Line#: NA

Original Specific Comment #: 7

Comment: The text lists three rail-related training subjects. The U.S. Department of Energy should consider including track maintenance training in this list because the on-site tracks may have to be repaired.

Response: Agree. The TDP will be revised to include track maintenance. However, a subcontractor possessing the required expertise may be utilized as necessary to provide guidance and oversight on non-routine maintenance activities associated with the trackage.

Action: The TDP has been revised to include "Track/Switch Maintenance". Additionally, Section 4.3.3 has been revised to state that "Routine maintenance activities associated with on-site tracks and switches will be performed by FAT&LC Maintenance personnel. Non-Routine maintenance may be performed utilizing a subcontractor with the required expertise."