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REPLY TO THE ATTENTION OF:  
FERNALD  
L-1732  
JUN 26 10 10 AM '98  
6446.4  
SRF-5J

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUN 25 1998

Mr. Johnny W. Reising  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 538705  
Cincinnati, Ohio 45253-8705

Subject: Technical Review Comments and Disapproval of the Draft  
"Miscellaneous Small Structures Implementation Plan for Above-Grade Decontamination and Dismantlement"

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the above-referenced document as part of its oversight activities for Operable Unit 3 at the Fernald Environmental Management Project. The document, which is dated April 1998, was received by U.S. EPA on May 5, 1998, and was prepared by Fluor Daniel Fernald for the U.S. Department of Energy (U.S. DOE). The document provides a decontamination and dismantlement (D&D) plan for 23 components ranging from Quonset huts to nuclear field services storage facilities. The document discusses the general remediation approach, component-specific remediation tasks, the project schedule, and management activities. Appendixes A through E of the document respectively present proposed sampling alternatives, material disposition alternatives, project work scope conditions and specifications, design drawings, and photographs.

U.S. EPA's review focused on assessing the general remediation approach and its consistency with U.S. EPA guidelines and standard construction practices. In general, the document presents a logical D&D approach and adequately addresses the primary environmental concerns associated with D&D of the small structures. However, additional clarification is needed regarding the component-specific remediation approach and the regulatory reporting procedures for the project. Therefore, U.S. EPA disapproves this document. U.S. EPA's general and specific review comments are enclosed. Please contact me at (312) 886-4591 if you have any questions.

Sincerely,

Gene Jablonowski  
Remedial Project Manager  
Federal Facilities Section  
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO  
Bill Murphie, U.S. DOE-HDQ  
John Bradburne, FERMCO  
Terry Hagen, FERMCO  
Tom Walsh, FERMCO

ENCLOSURE

TECHNICAL REVIEW COMMENTS ON DRAFT  
"MISCELLANEOUS SMALL STRUCTURES IMPLEMENTATION PLAN FOR ABOVE-GRADE  
DECONTAMINATION AND DISMANTLEMENT"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

(Two Pages)

TECHNICAL REVIEW COMMENTS ON DRAFT  
 "MISCELLANEOUS SMALL STRUCTURES IMPLEMENTATION PLAN FOR ABOVE-GRADE  
 DECONTAMINATION AND DISMANTLEMENT"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENTS

Commenting Organization: U.S. EPA Commentor: Jablonowski  
 Section #: Not Applicable (NA) Page #: NA Line #: NA  
 Original General Comment #: 1  
 Comment: The text in the cover letter and throughout the plan refers to both components and task orders. The application of the two terms is not entirely clear and leads to confusion regarding how the U.S. Department of Energy (DOE) will proceed with the component-specific remediation. Specifically, it is not clear whether several components are covered by a task order or whether a component will be remediated under several task orders. The plan should be revised to clarify this matter.

Commenting Organization: U.S. EPA Commentor: Jablonowski  
 Section #: NA Page #: NA Line #: NA  
 Original General Comment #: 2  
 Comment: The text in the cover letter refers to a verbal agreement between DOE and the regulatory agencies and describes a process for communicating and documenting project information. The text in Section 4.0 of the plan contains a brief discussion of project reporting. The plan should be revised to clearly and concisely summarize project and component (or task order) communication and reporting between DOE and the regulatory agencies. Moreover, DOE's reporting procedure should include submittal of component completion letter reports. Such reports will serve to document the completion of each component's remediation and to provide updates on the overall project status.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Jablonowski  
 Section #: 2.1 Page #: 7 Line #: 20 and 21  
 Original Specific Comment #: 1  
 Comment: The bulleted list identifies Components 38A and 38B as the sixth and seventh components in the proposed remediation sequence. In Section 4.0, however the text indicates that Components 38A and 38B will be the first components remediated. The plan should be revised to resolve this discrepancy.

Commenting Organization: U.S. EPA Commentor: Jablonowski  
 Section #: 2.4 Page #: 18 Line #: 27  
 Original Specific Comment #: 2  
 Comment: The text indicates that two samples will be collected from the estimated 2,500 gallons of equipment decontamination wash water prior to its discharge into the Advanced Wastewater Treatment Facility. It is not clear whether DOE intends to collect two

samples total or two samples for each component. If DOE intends to collect two samples total, it is not clear which component's wash water will be sampled. The text should be revised to clarify the sampling plan in this regard and to provide any necessary justification for the proposed sampling approach.