



**Department of Energy**

**Ohio Field Office  
Fernald Area Office  
P. O. Box 538705  
Cincinnati, Ohio 45253-8705  
(513) 648-3155**



**1637**

**AUG 13 1998**

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

**DOE-1091-98**

**Dear Mr. Jablonowski:**

**THE U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENT RESPONSES AND  
REVISIONS FOR MISCELLANEOUS SMALL STRUCTURES PROJECT IMPLEMENTATION  
PLAN AND TASK ORDER #387 ISSUANCE NOTIFICATION**

**Reference: Letter, G.A. Jablonowski to J.W. Reising, "Technical Review Comments and  
Disapproval of the Draft Miscellaneous Small structures Implementation Plan  
for Above-Grade Decontamination and Dismantlement," dated June 25,  
1998.**

**This letter transmits the Department of Energy (DOE) responses to the U.S. Environmental  
Protection Agency (U.S. EPA) to address technical review comments made on  
the April 1998 draft Miscellaneous Small Structures (MSS) Project Implementation Plan.  
This letter also transmits the necessary notification documentation to commence  
Decontamination and Dismantlement (D&D) of Task Order #387.**

**The Ohio Environmental Protection Agency (OEPA) approved the Implementation Plan on  
July 9, 1998. Within 30 days from the U.S. EPA approval of these revisions, the  
Implementation Plan will be prepared in final form for distribution.**

**As stated in the revised text for Section 1.2. of the Implementation Plan, commencement  
of D&D work will be authorized through the issuance of a Task Order, which may include  
the D&D of more than once component. Also per the revised text contained in  
Section 4.0, an implementation schedule will be submitted to the regulatory agencies  
which contains three regulatory milestones: 1) Notice to Proceed (Task Order Issuance);  
2) Start of Field Activities; and 3) Completion of Field Activities. Accordingly, you will find  
enclosed the implementation schedule for Task Order #387, which includes Component  
3F - Harshaw System; 3G - Refrigeration Building, and 24B - Railroad Engine House.**

**1**

Mr. Gene Jablonowski

-2-

1637

If you have any questions, please contact Art Murphy at (513) 648-3132.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Trygier

**Enclosures:**

**cc w/enclosures:**

N. Hallein, EM-42/CLOV  
A. Murphy, DOE-FEMP  
J. Trygier, DOE-FEMP  
T. Schneider, OEPA-Dayton  
R. Beaumier, TPSS/DERR, OEPA-Columbus  
J. Saric, USEPA-V, SRF-5J  
F. Bell, ATSDR\  
M. Schupe, HSI GeoTrans  
R. Vandegrift, ODH  
F. Barker, Tetra Tech  
AR Coordinator, FDF/78

**cc w/o enclosures:**

A. Tanner, DOE-FEMP  
P. R. Courtney, FDF/52-2  
L. C. Goidell, FDF/65-2  
T. D. Hagen, FDF/65-2  
J. Harmon, FDF/90  
R. Heck, FDF/2  
S. Hinnefeld, FDF/2  
D. Paine, FDF/52-4  
N. E. Pennington, FDF/44-1  
T. J. Walsh, FDF/65-2  
EDC, FDF/52-7

# OPERABLE UNIT 3

MISCELLANEOUS SMALL STRUCTURES D&D PROJECT  
IMPLEMENTATION PLAN

COMMENT RESPONSE PACKAGE



AUGUST 1998

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT  
FERNALD, OHIO

U. S. DEPARTMENT OF ENERGY  
FERNALD AREA OFFICE

## INTRODUCTION

Department of Energy (DOE) comment responses have been provided on the following pages to address U.S. Environmental Protection Agency (U.S. EPA) comments to the February 1998 draft Miscellaneous Small Structures Implementation Plan for Above-Grade Decontamination and Dismantlement. The U.S. EPA comments, dated June 25, 1998, include two general comments and two specific comments. The Ohio EPA response was returned without comment.

This comment response document is divided into three sections, which are described below:

- Section 1: Includes a reiteration of U.S. EPA comments to the draft Miscellaneous Small Structures D&D Implementation Plan, each of which is followed by a DOE response and description of action taken.
- Section 2: Identifies a significant DOE enhancement made to the implementation plan.
- Section 3: Includes the redline/strikeout change pages of the implementation plan, which were prepared as a result of U.S. EPA comments. These change pages represent the draft final version of the document. Upon approval of the revisions provided in this comment response package, the implementation plan will be prepared in final form for distribution.

## INTRODUCTION

Department of Energy (DOE) comment responses have been provided on the following pages to address U.S. Environmental Protection Agency (U.S. EPA) comments to the February 1998 draft Miscellaneous Small Structures Implementation Plan for Above-Grade Decontamination and Dismantlement. The U.S. EPA comments, dated June 25, 1998, include two general comments and two specific comments. The Ohio EPA response was returned without comment.

This comment response document is divided into three sections, which are described below:

- Section 1: Includes a reiteration of U.S. EPA comments to the draft Miscellaneous Small Structures D&D Implementation Plan, each of which is followed by a DOE response and description of action taken.
- Section 2: Identifies a significant DOE enhancement made to the implementation plan.
- Section 3: Includes the redline/strikeout change pages of the implementation plan, which were prepared as a result of U.S. EPA comments. These change pages represent the draft final version of the document. Upon approval of the revisions provided in this comment response package, the implementation plan will be prepared in final form for distribution.

## SECTION 1

U.S. EPA Comments on the Draft Miscellaneous Small Structures  
D&D Project Implementation Plan and DOE Responses

## U.S. EPA GENERAL COMMENTS

U.S. EPA Original General Comment #1

*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.*

DOE Response:

Agree. It is possible that more than one component will be scheduled under one Task Order; for example, since components 38A and 38B are to be remediated at approximately the same time, one Task Order has been issued which will cover both. However, there are no plans to D&D any one component under more than one Task Order.

As stated in Section 2.1, there are many reasons why the component sequencing could change. Since there is no way to accurately forecast when each component will be remediated, and how the components will be grouped into Task Orders, the exact number of Task Orders that will be issued cannot be predetermined.

DOE Action:

In order to clearly communicate the above explanation, the text has been changed. In Section 3 of this document, please refer to the redlined text on page 3, lines 12-15.

U.S. EPA Original General Comment #2

*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.*

DOE Response:

The DOE agrees that clarification is needed.

**U.S. EPA Comments on the Draft Miscellaneous Small Structures  
D&D Project Implementation Plan and DOE Responses  
(Continued)**

DOE will notify the regulatory agencies when a Task Order has been assigned to the Site support Contractor in the form of a telephone call prior to or concurrent with the "Notice to Proceed", and this notification will be followed-up in written form through the submittal of a letter. The verbal and written notifications will identify at least the Task Order scope, components, and the start and completion dates.

Within 30 days from the completed D&D activities covered in a Task Order, DOE will provide the regulatory agencies with a Task Order Completion Report that will address the following issues:

- A summary description of the Task Order scope and components;
- The start and completion dates of D&D activities;
- The location of the debris generated by the D&D activities; and
- Any documented lessons learned from the Task Order implementation.

All other details will be compiled in the MSS-D&D Project Completion Report, which will be submitted to the regulatory agencies within 60 days following completion of the last Task Order.

DOE Action:

Section 4 of the Implementation Plan has been revised to summarize MSS Project and Task Order- specific reporting. In Section 3 of this document, please refer to redlined text on page 64, lines 1; 5 - 7; 8 - 12; and 15 - 22.

**U.S. EPA SPECIFIC COMMENTS**

U.S. EPA Original Specific Comment #1

*[Re: page 7, lines 20 and 21] 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.*

DOE Response:

Agree.

DOE Action:

The sequencing of components as listed in Section 2.1 has been changed accordingly. In Section 3 of this document, please refer to the redline/strikeout text on page 7, lines 15 - 16 and 22 - 23.

U.S. EPA Comments on the Draft Miscellaneous Small Structures  
D&D Project Implementation Plan and DOE Responses  
(Continued)

U.S. EPA Original Specific Comment #: 2

*[Re: page 18, line 27] 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 wastewater 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.*

DOE Response:

Agree. The estimate of two samples is based on Task Order - specific projections. Washwater collection, sampling, and discharge will be done on a Task Order - specific basis. Based on the sample results of past wastewater samples, there is no reason to suspect that the wastewater from the D&D of any one component will be contaminated to the point where pre-treatment is needed. However, the intent is to collect the wastewater from the decontamination of components included in each Task Order, and sample as needed for discharge to the AWWT. Considering the prospect for numerous Task Orders, it is possible that many more than two samples will be taken over the course of all MSS Project Task Orders.

DOE Action:

The referenced text has been revised to reflect that an estimated two samples will be collected from wastewater generated during implementation of each Task Order. In Section 3 of this document, please refer to page 19, lines 15 - 18, for redline/strikeout text.

SECTION 2

Other Significant DOE Enhancements to the Draft  
Miscellaneous Small Structures D&D Project Implementation Plan

The reference shown below identifies a significant DOE enhancement made to the draft implementation plan resulting from the need to provide greater clarification of certain topics as well as provide significant updated information. The basis for the enhancement is also identified.

Significant DOE Enhancement:

Transfer the decontamination and dismantling of an Electrical Utility Tower from the Sewage Treatment Plant Complex D&D Project to the MSS-D&D Project.

1. Description

The structure is approximately 107 feet high, and is the northernmost tower (of two) located between RIMIA (82A) and the Old Sewage Treatment Plant. For the location, see Section 3 of this document, page 5 (the Electrical Utility Tower is shown in the lower right portion of the drawing).

2. Basis for Enhancement

The Electrical Utility Tower was listed as a component in the February 1998 draft of the Sewage Treatment Plant Complex D&D Implementation Plan. However, contractual issues between FDF, DOE, and Cincinnati Gas and Electric may not be resolved in the near future; for this reason, the Tower will be dismantled and disposed of as a component of the MSS-D&D Project.

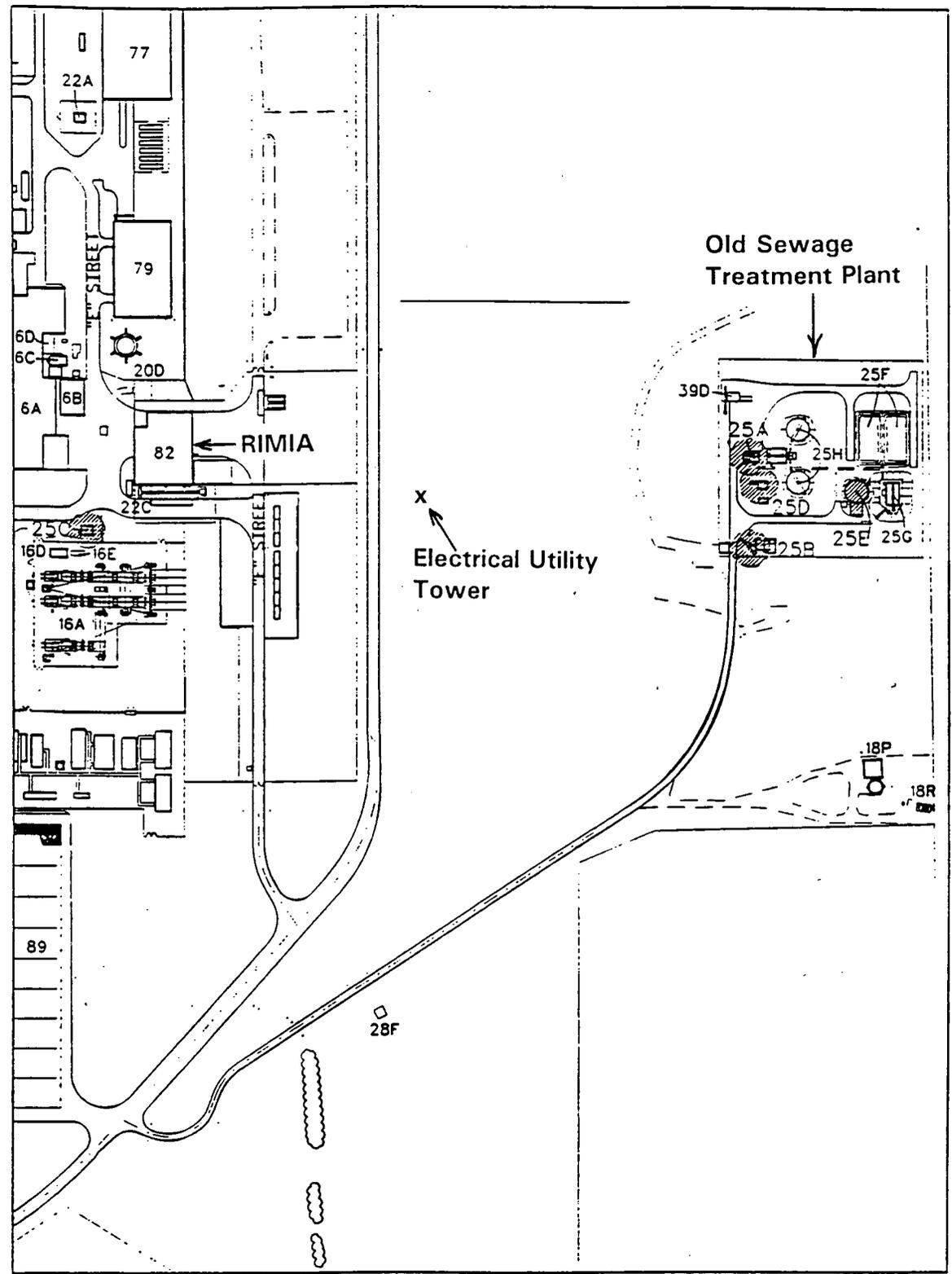
3. Reference

Section 3.24 has been added to the MSS-IP, which incorporates the original write-up of the Electrical Utility Tower from the February 1998 draft of the STP Complex D&D Implementation Plan. As a result, the following redline changes to the MSS-IP are shown in Section 3 of this document:

- Page ii, new Section 3.24;
- Page 2, lines 33 - 37;
- Page 7, line 40;
- Page 14, lines 1 - 5;
- Pages 15, 16, and 17, as the last "Component Designation" in each table (the "Total" rows have been changed to include the Electrical Utility Tower figures);
- Page 24, line 32;
- Page 63, lines 1 - 18;
- Figure D-24 (structural drawing); and
- Figure E-25 (photograph).

The specific location of the Electrical Utility Tower is shown in Figure 2-1, on the following page.

Other Significant DOE Enhancements to the Draft  
Miscellaneous Small Structures D&D Project Implementation Plan  
(Continued)



SECTION 3

**Redline/Strikeout Pages Resulting from U.S. EPA. Ohio EPA Comments and a DOE Enhancement to the Draft MSS-D&D Project Implementation Plan**

The pages contained in this section are shown in redline/strikeout form to show how text from the draft version of the implementation plan was affected by U.S. EPA comments and DOE responses presented in Section 1, and by a DOE enhancement identified in Section 2. Upon approval of the revisions contained in Section 3, the redline/strikeout markings will be removed to finalize the document.

1637

**D**

3.10	Component 12B - Cylinder Storage Building	43
3.11	Component 12C - Lumber Storage Building	44
3.12	Component 22A - Gas Meter Building	46
3.13	Component 22D - Scale House	46
3.14	Component 24B - Railroad Engine House	47
3.15	Component 38A - Propane Storage	49
3.16	Component 38B - Cylinder Filling Station	50
3.17	Component 39B - Waste Oil Decant Shelter	51
3.18	Component 39C - Incinerator Sprinkler Riser House	53
3.19	Component 45B - Utility Shed East of Trailers	54
3.20	Component 60 - Quonset Hut 1	55
3.21	Component 61 - Quonset Hut 2	56
3.22	Component 62 - Quonset Hut 3	57
3.23	Component 63 - KC-2 Warehouse	58
3.24	Electrical Utility Tower	63
4.0	PROJECT SCHEDULE AND REPORTING	64
5.0	MANAGEMENT	66
REFERENCES		68

**A**  
FIGURES

FIGURE 1-1	Location of Miscellaneous Small Structures	5
FIGURE 4-1	Schedule for D&D of Components 38A and 38B	64

TABLES

TABLE 2-1	Summary of Radiological Data	9
TABLE 2-2	Bulked Material Volume Estimates	15
TABLE 2-3	Unbulkied Material Volume Estimates	16
TABLE 2-4	Material Weight Estimates	17
TABLE 2-5	Applicable Remediation/Above-Grade Dismantlement Activities for Components	24

LIST OF APPENDICES

APPENDIX A	Proposed Sampling
APPENDIX B	Evaluation of Material Disposition Alternatives
APPENDIX C	Project Work Scope Conditions/Specifications
APPENDIX D	Design Drawings
APPENDIX E	Photographs

**T**

11

## D 2 Scope of Work

The MSS-D&D Project includes the following major activities:

- Preparatory Action: Inventory Removal;
- Preparatory Action: Safe Shutdown;
- Hazardous Waste Management Unit decontamination;
- Asbestos Abatement;
- Surface Decontamination; and
- Above Grade Dismantlement.

The following components are included in the MSS-D&D Project:

- Component 2E - Nuclear Fuel Services Storage and Pump House
- Component 2F - Cold Side Ore Conveyor
- Component 2G - Hot Side Ore Conveyor
- Component 3B - Ozone Building
- Component 3C - NAR Control House
- Component 3F - Harshaw System
- Component 3G - Refrigeration Building
- Component 8F - Plant 8 Old Drum Washer
- Component 10D - Contaminated Oil/Graphite Burn Pad
- Component 12B - Cylinder Storage Building
- Component 12C - Lumber Storage Building
- Component 22A - Gas Meter Building
- Component 22D - Scale House
- Component 24B - Railroad Engine House
- Component 38A - Propane Storage
- Component 38B - Cylinder Filling Station
- Component 39B - Waste Oil Decant Shelter
- Component 39C - Incinerator Sprinkler Riser House
- Component 45B - Utility Shed East of Trailers
- Component 60 - Quonset Hut 1
- Component 61 - Quonset Hut 2
- Component 62 - Quonset Hut 3
- Component 63 - KC-2 Warehouse
- Electrical Utility Tower

The Electrical Utility Tower listed above was originally scheduled to be decontaminated and dismantled as a part of the Sewage Treatment Plant D&D Project. Due to a contractual delay involving the Cincinnati Gas and Electric Company, it was decided to transfer this activity to the MSS-D&D Project.

The requirements for the MSS-D&D Project were developed using the performance

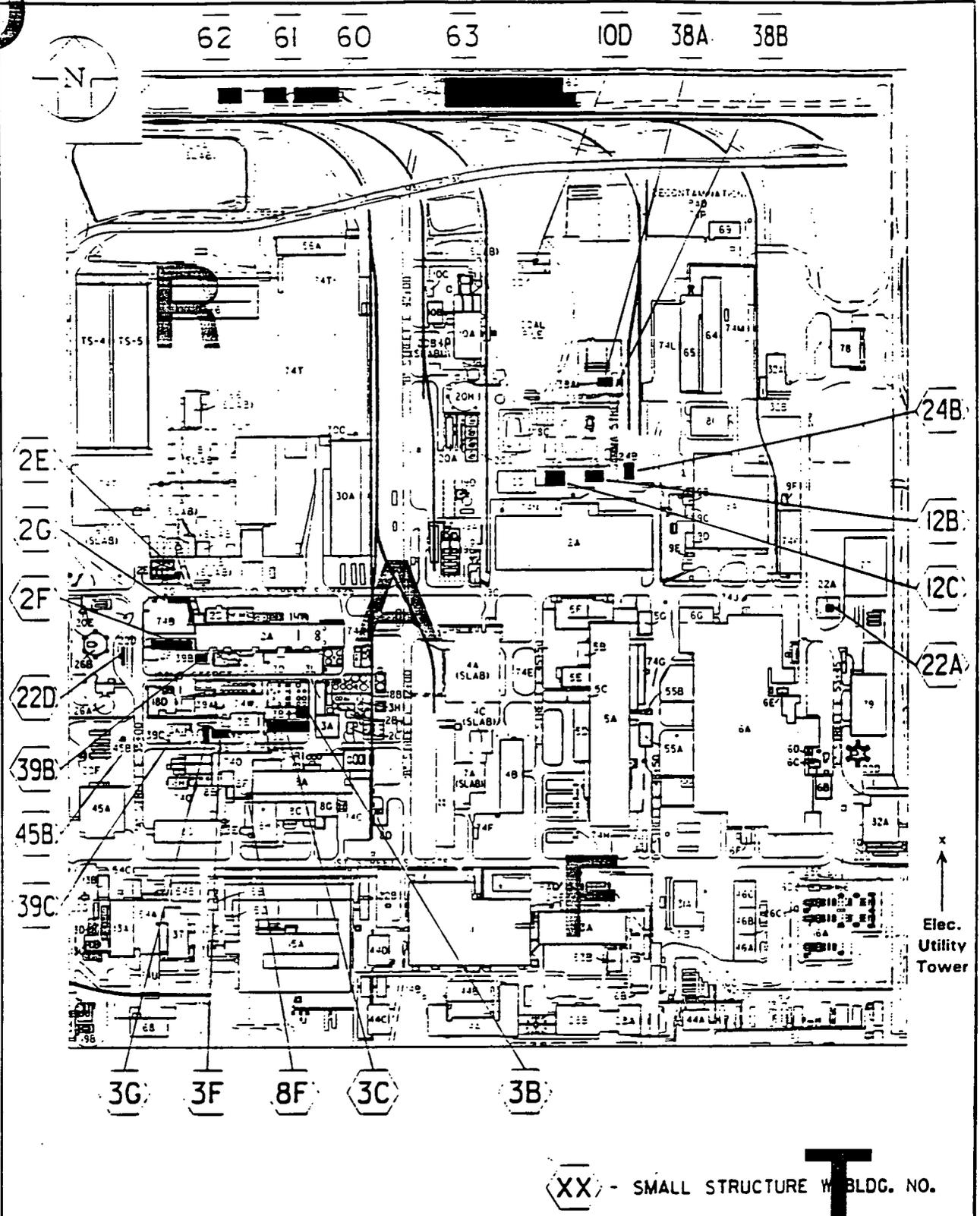
specifications that were included in Appendix B of the OU3 Integrated RD/RA Work Plan. Since this project is going to utilize the remediation support contract strategy (a.k.a., Site Support Contract), discussed in Section 3.1.4 of the OU3 Integrated RD/RA Work Plan, the typical set of performance specifications will not be used for this project. Rather, the design and contractor work scope development for the MSS-D&D Project incorporate the applicable requirements of the performance specifications and further details FEMP-approved methods that the contractor will be required to use for accomplishing activities. The detailed specifications which were developed as the basis for the contractor work scope are included in Appendix C of this Implementation Plan. By basing the contractor work requirements on established performance specifications, the strategies for MSS-D&D operations remain consistent with previously approved approaches.

~~The contractor will be authorized to commence work through the issuance of a Task Order. Based upon the actual sequencing of work as discussed in Section 2.1, a Task Order may include the D&D of more than one component (however, there are no plans for any given component to be covered by more than one Task Order).~~

DOE will provide notification to the regulatory agencies of any significant changes to the design prior to implementation. Should the regulatory agencies have any concerns regarding any significant design change, DOE will properly address those concerns as soon as practicable and, if necessary, perform one or more of the following: amend this Implementation Plan, amend the OU3 Integrated RD/RA Work Plan, present an explanation of significant difference to the RODs, and/or amend the RODs. Significant changes to the design will require formal design modification and may require that affected activities be suspended until the revision has been completed and approved. This course of action adheres to the commitments made in Section 4.2.2 of the OU3 Integrated RD/RA Work Plan for design changes.

T

D



XX - SMALL STRUCTURE W/ BLDG. NO.

Fernald Environmental Management Project

**FLUOR DANIEL FERNALD**

U.S. DEPARTMENT OF ENERGY

PRODUCTION AREA SITE MAP

**FIGURE 1-1**

MISC. SMALL STRUCTURES  
D & D PROJECT

RES #3436
DATE 2/2/97
BY SMOCA

14

# D 2.0 GENERAL PROJECT REMEDIATION APPROACH

The overall approach to the remediation of the MSS-D&D Project components incorporates the applicable programmatic elements and tasks that were described in Section 3 of the OU3 Integrated RD/RA Work Plan. This section describes project-specific applications of those elements.

## 2.1 Sequencing of Remediation

The most logical sequencing of the Miscellaneous Small Structures Projects would be in accordance with the phasing of major projects, which at the FEMP proceeds generally in a northeast to southwest direction. Based on this approach, the proposed sequencing of Decontamination and Dismantling is as follows:

- ~~Component 38A - Propane Storage~~
- ~~Component 38B - Cylinder Filling Station~~
- Component 63 - KC-2 Warehouse
- Component 60 - Quonset Hut 1
- Component 61 - Quonset Hut 2
- Component 62 - Quonset Hut 3
- Component 10D - Contaminated Oil/Graphite Burn Pad
- ● ~~Component 38A - Propane Storage~~
- ● ~~Component 38B - Cylinder Filling Station~~
- Component 24B - Railroad Engine House
- Component 12B - Cylinder Storage Building
- Component 12C - Lumber Storage Building
- Component 2E - Nuclear Fuel Services Storage and Pump House
- Component 2F - Cold Side Ore Conveyor
- Component 2G - Hot Side Ore Conveyor
- Component 39B - Waste Oil Decant Shelter
- Component 22D - Scale House
- Component 3B - Ozone Building
- Component 3C - NAR Control House
- Component 3F - Harshaw System
- Component 3G - Refrigeration Building
- Component 39C - Incinerator Sprinkler Riser House
- Component 45B - Utility Shed East of Trailers
- Component 8F - Plant 8 Old Drum Washer
- Component 22A - Gas Meter Building
- ~~Electrical Utility Tower~~

alternatives to on-site disposal. The 7.3 tons of accessible metals that will be generated by the dismantling of the electrical utility tower, which is located in a non-radiologically controlled area, will be size-reduced and sold as scrap by FEMP Property Management under the personal property disposition process and, therefore, were not included in the 313.1 tons considered for the evaluation. Of the three phases of the Decision Methodology (Threshold Phase, Life Cycle Analysis Phase, and Decision Phase), only the first phase was applied since the comparative evaluation of project costs for each alternative showed that the total costs for each of the recycling options greatly exceeded the 25 percent total cost criteria compared to OSDF.

### 2.3.6 Material Management Reporting

As Task Orders for the components are completed, the waste data will be entered into the Site-Wide Information, Forecasting, and Tracking System (SWIFTS). This data will be provided to the EPA in the Quarterly SWIFTS Report. A final summary will be included in the Close-out Report of the MSS-D&D Project.

Materials that do not meet facility release criteria (discussed in Section 2.5.2) will be containerized inside the structure or in a loadout vestibule that is part of an enclosure attached to that structure. Should any materials be encountered that do not meet the OSDF waste acceptance criteria (e.g., materials with "visible process residues" - such as yellow cake, green salt, etc.), they will be containerized separately from other OSDF-bound materials, follow the same load-out and transportation procedures, and will be transported to the Plant 1 Storage Pad for Nevada Test Site disposal. Stockpiling of debris is not currently planned due to the expected availability for placement in the OSDF.

Material tracking and reporting will be accomplished through use of SWIFTS. Section 3.3.2.2 (Segregation, Containerization, Tracking) of the OU3 Integrated RD/RA Work Plan describes material tracking and reporting using SWIFTS. Project-specific material tracking and reporting strategies for the MSS-D&D Project do not differ from the strategies laid out in the OU3 Integrated RD/RA Work Plan, and therefore no additional details were developed during the remedial design process.

TABLE 2-2 Miscellaneous Small Structures and Facilities D&D Bulked Material Estimates (ft<sup>3</sup>)

Component Designation	Accessible Metals	Inaccessible Metals	Process Related Metals	Painted Light-Gauge Metals	Concrete	Acid Brick	Non-Regulated ACM	Regulated ACM <sup>(1)</sup>	Misc. Mats <sup>(2)</sup>	Lead Flashing	Component/Complex Totals
2E	6,531	1,057	0	0	603	0	0	306	3,129	0	11,626
2F	24	224	0	0	0	0	77	14	0	0	339
2G	99	445	0	0	0	0	42	7	0	0	593
3B	581	82	0	2	0	0	108	0	84	0	857
3C	962	2,190	0	6	0	0	583	17	4,581	2	8,341
3F	1,312	6,640	0	0	0	155	0	0	0	0	8,107
3G	333	238	0	8	0	0	298	7	0	4	888
8F	0	146	0	4	0	0	0	2	0	0	152
10D	0	109	0	0	0	0	0	0	96	0	205
12B	146	394	0	46	993	0	0	0	36	0	1,615
12C	262	459	0	0	0	0	0	0	3	0	724
22A	0	136	0	6	866	0	0	41	2	0	1,051
22D	0	12	0	0	0	0	11	0	2	0	25
24B	221	167	0	16	2,392	0	47	0	333	4	3,180
38A	7,623	2,040	0	16	2,215	0	0	252	6	4	12,156
38B	0	37	0	0	0	0	7	0	6	0	50
39B	109	201	0	18	0	0	0	0	0	0	328
39C	0	241	0	0	378	0	0	0	0	0	619
45B	0	3	0	0	0	0	0	2	210	0	215
60	595	163	0	36	0	0	0	0	18	0	812
61	309	88	0	18	0	0	0	0	12	0	427
62	309	88	0	18	0	0	0	0	12	0	427
63	1,078	1,166	0	30	11,873	0	0	0	6,114	0	20,261
<b>Elec. Towers</b>	<b>594</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>594</b>
<b>Total</b>	<b>21,088</b>	<b>16,326</b>	<b>0</b>	<b>224</b>	<b>19,320</b>	<b>155</b>	<b>1,173</b>	<b>648</b>	<b>14,644</b>	<b>14</b>	<b>73,692</b>
<b>Container</b> <sup>(3)</sup>	<b>ROB</b>	<b>ROB</b>	<b>0</b>	<b>ROB</b>	<b>ROB</b>	<b>SWMB</b>	<b>Pallets</b> <sup>(4)</sup> <b>/SWMB</b>	<b>ISO</b>	<b>ROB</b>	<b>Drum</b>	
Quantity	25	20	0	1	50 <sup>(5)</sup>	2	2	1	15	2	
Disposition	OSDF <sup>(6)</sup>	OSDF	N/A <sup>(7)</sup>	OSDF	OSDF	PCDF <sup>(8)</sup>	OSDF	OSDF	OSDF	PCDF	

(1) Excludes gutter cleanout which will be placed in drums (volume estimated at less than one drum)  
 (2) Excludes compactables which will be placed in contaminated trash dumpster for compaction. Miscellaneous materials can be containerized with Non-regulated ACM.  
 (3) ROB: Roll Off Box, holds 810 cubic feet and/or 33,000 pounds of material; SWMB: Small White Metal Box, holds 82 cubic feet and/or 7,800 pounds of material; ISO: End Loading Container Sea Land boxes, hold up to 1,025 cubic feet and/or 42,000 pounds of material; Drum: 7 cubic feet and/or 832 pounds of material.  
 (4) This category includes transite which is segregated from other nonregulated ACM; sprayed with encapsulant; banded in 18 in. bundles and palletized; and stockpiled.  
 (5) Container is weight restricted.  
 (6) OSDF: On-site Disposal Facility.  
 (7) In the event Process Related Metals are encountered, it will be disposed at NTS and described in the project completion report.  
 (8) PCDF: Permitted Commercial Disposal Facility

1637

TABLE 2-3 Miscellaneous Small Structures and Facilities D&D Unbulked Material Estimates (ft<sup>3</sup>)

Component Designation	Accessible Metals	Inaccessible Metals	Process Related Metals	Painted Light-Gauge	Concrete	Acid Brick	Non-Regulated	Regulated ACM	Misc Materials	Lead Flashing	Component/Complex Totals
2E	1,921	311	0	0	464	0	0	90	1,043	0	3,829
2F	7	66	0	0	0	0	64	4	0	0	141
2G	29	131	0	0	0	0	35	2	0	0	197
3B	171	24	0	1	0	0	90	0	28	0	314
3C	283	644	0	3	0	0	486	5	1,591	1	3,013
3F	386	1,953	0	0	0	119	0	0	0	0	2,458
3G	98	70	0	4	0	0	248	2	0	2	424
8F	0	43	0	2	0	0	0	0.5	0	0	45.5
10D	0	32	0	0	0	0	0	0	32	0	64
12B	43	116	0	23	764	0	0	0	12	0	958
12C	77	135	0	0	0	0	0	0	1	0	213
22A	0	40	0	3	666	0	0	12	0.5	0	721.5
22D	0	3.5	0	0	0	0	9	0	0.5	0	13
24B	65	49	0	8	1,840	0	39	0	111	2	2,114
38A	2,242	600	0	8	1,704	0	0	74	2	2	4,632
38B	0	11	0	0	0	0	7	0	2	0	20
39B	32	59	0	9	0	0	0	0	0	0	100
39C	0	71	0	0	291	0	0	0	0	0	362
45B	0	1	0	0	0	0	0	0.5	70	0	71.5
60	175	48	0	18	0	0	0	0	6	0	247
61	91	26	0	9	0	0	0	0	4	0	130
62	91	26	0	9	0	0	0	0	4	0	130
63	317	343	0	15	9,133	0	0	0	2,038	0	11,846
<b>Rec. Tower</b>	<b>243</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>243</b>
<b>Total</b>	<b>6,271</b>	<b>4,802.5</b>	<b>0</b>	<b>112</b>	<b>14,862</b>	<b>119</b>	<b>978</b>	<b>190</b>	<b>4,945</b>	<b>7</b>	<b>92,286.5</b>

18

TABLE 2-4 Miscellaneous Small Structures and Facilities D&D Material Weight Estimates (Tons)

Component Designation	Accessible Metals	Inaccessible Metals	Process Related Metals	Painted Light-Gauge Metals	Concrete	Acid Brick	Non-Regulated ACM	Regulated ACM	Misc Materials	Lead Flashing	Component/Complex Totals
2E	99.9	11.2	0	0	11.6	0	0	1.9	21.9	0	146.5
2F	0.5	2.5	0	0	0	0	1	0	0	0	4
2G	1.5	4.7	0	0	0	0	0.5	0	0	0	6.7
3B	8.9	0.9	0	0	0	0	1.3	0	0.6	0	11.7
3C	14.7	23.2	0	0	0	0	7	0.1	33.4	0	78.4
3F	20	70.3	0	0	0	3	0	0	0	0	93.3
3G	5	2.5	0	0	0	0	3.6	0	0	0	11.1
8F	0	1.5	0	0	0	0	0	0	0	0	1.5
10D	0	1.1	0	0	0	0	0	0	0.7	0	1.8
12B	2.2	4.1	0	0.2	19.1	0	0	0	0.2	0	25.8
12C	4	4.9	0	0	0	0	0	0	0	0	8.9
22A	0	1.4	0	0	16.7	0	0	0.3	0	0	18.4
22D	0	0.1	0	0	0	0	0.1	0	0	0	0.2
24B	3.3	1.8	0	0.1	46	0	0.5	0	2.3	0	54
38A	116.5	21.6	0	0.1	42.6	0	0	1.6	0	0	182.4
38B	0	0.4	0	0	0	0	0.1	0	0	0	0.5
39B	1.6	2.1	0	0	0	0	0	0	0	0	3.7
39C	0	2.5	0	0	7.2	0	0	0	0	0	9.7
45B	0	0	0	0	0	0	0	0	1.5	0	1.5
60	9.1	1.7	0	0.1	0	0	0	0	0.1	0	11
61	4.7	0.9	0	0.1	0	0	0	0	0.1	0	5.8
62	4.7	0.9	0	0.1	0	0	0	0	0.1	0	5.8
63	16.5	12.3	0	0.1	228.3	0	0	0	42.8	0	300
<b>ELECTRICAL</b>	<b>7.3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7.3</b>
<b>Total</b>	<b>320.4</b>	<b>172.6</b>	<b>0</b>	<b>0.8</b>	<b>371.5</b>	<b>3</b>	<b>14.1</b>	<b>3.9</b>	<b>103.7</b>	<b>0</b>	<b>990</b>

**D**

**Section 3.3.3 Management of Secondary Waste:** The overall strategy for managing wastewater, as one of the primary aspects of secondary waste, through the site wastewater treatment system.

- **Section 3.5.2 Management of Contaminated Water:** References site procedure to be used for the evaluation and management of contaminated wastewater.

**R**

- **SAP/Section 2 General Sampling and Data Collection Approach:** Focuses on wastewater sampling, among other aspects of sampling.

- **SAP/Section 3 Specific Sampling Programs:** Sampling for disposition of wastes, including wastewater, and determination of hazardous, radiological, and other waste characteristics.

**A**

The Wastewater Treatment System (WWTS) Manager has been provided with a spreadsheet containing OU3 R/FS data on the MSS-D&D Project components to determine whether potential elevated levels of contaminants of concern may be present. Based on an estimated 2,500 gallons of equipment decontamination washwater total for the MSS Project, it is projected that two samples may be taken from washwater generated from each Task Order. Any washwater that is generated will be placed in a 3,000 gallon container, from which it is anticipated that two samples will be taken to determine isotopic, radiological and heavy metals concentrations prior to discharge into the Advanced Wastewater Treatment Facility. Of those two samples, one will be a duplicate for quality assurance/quality control purposes. The purpose of the sampling is to ensure the adequacy of treatment capacity so that National Pollutant Discharge Elimination System (NPDES) permit requirements are met.

Project-specific reporting for wastewater (i.e., equipment decontamination washwater) collection and treatment will be provided in the project completion report, which will include a summary of the results generated during the project. For wastewater, the report will include a summary of the results from any sampling and analysis prior to its discharge into the FEMP WWTS. For site-wide air monitoring, the report will identify site air monitoring stations but

Utility isolation involves the disconnection of all steam, potable water, electrical power, fire protection alarms and systems, compressed air, and communication systems. The fire alarm systems will be terminated in the components to be dismantled (where this would interrupt the alarm systems in neighboring facilities, the alarm systems for those facilities will be re-routed and re-activated).

TABLE 2-5 Applicable Remediation/Above-Grade Dismantlement Activities for Components

Component Designation	Inventory Removal	Safe Shutdown	HWMU Decontam.	Asbestos Abatement	Surface Decontam.	Eq./Sys. Dismant.	Transite Removal	Str. Steel Dismant.	Conc./Mas. Removal
2E	X	X	X	X	X	X	-	X	X
2F	X	X	-	X	X	X	X	X	-
2G	X	X	-	X	-	X	X	X	-
3B	X	X	-	-	-	X	X	X	-
3C	X	X	-	X	-	X	X	X	-
3F	-	X	-	-	-	X	-	X	-
3G	X	X	-	-	-	X	X	X	-
8F	-	X	-	-	X	X	-	X	-
10D	-	X	-	-	-	X	-	X	X
12B	X	X	-	-	-	X	-	X	X
12C	X	X	-	-	-	-	-	X	-
22A	X	X	-	-	-	X	-	X	X
22D	-	X	-	-	-	X	X	X	-
24B	X	X	-	X	-	X	-	X	X
38A	X	X	-	X	-	-	-	X	X
38B	X	X	-	X	-	-	X	X	-
39B	X	X	X	-	X	X	-	X	-
39C	-	X	-	-	-	X	X	X	X
45B	-	X	-	-	-	-	-	-	-
60	X	X	-	-	-	X	-	X	-
61	X	X	-	-	X	X	-	X	-
62	X	X	-	-	-	X	-	X	-
63	X	X	X	-	-	X	-	X	-
Elec. Tower	-	-	-	-	-	-	-	X	-

### D-24 Electrical Utility Tower

This structure, which is the northern-most tower (of two) located between RIMIA (82A) and the STP area, is to be handled as Category A (accessible metals) originating from a non-radiologically controlled area. D&D Project Planning has coordinated with FEMP Personal Property Management to sell the scrap steel from this structure to a recycling vendor. Since the steel from this tower is not radiologically contaminated, radiological screening/surveying is not necessary. Section views of this structure are provided in Figure D-24 (Appendix D). Figure E-40 provides a photograph of this structure.

The dismantlement strategy for the utility tower includes the removal of all electrical cable by the owner electrical utility service company, Cinergy/Cincinnati Gas & Electric. Dismantlement of the tower itself has been proposed to include an engineered fall of the structure by strategic notching of the main supports with guide cables to direct the fall to the east (away from any structures or planned activity). Hydraulic shears would then be used to reduce the structural frame into approximately 10 foot lengths and placed into the container(s) supplied by the successful recycling bidder. Four small above-grade portions of the tower will remain in place for future Area 1 Phase II excavation by the SCEP. Per request of Area 1 Phase II SCEP integrators, approximately two feet of the above-grade steel supports (legs) will remain in place and will be painted orange with flags to aid in visibility.

F

T

# 4.0 PROJECT SCHEDULE AND REPORTING

This section identifies the strategy that was agreed upon by the regulators and the DOE regarding the submittal of schedules for future Task Orders under the MSS-D&D Project.

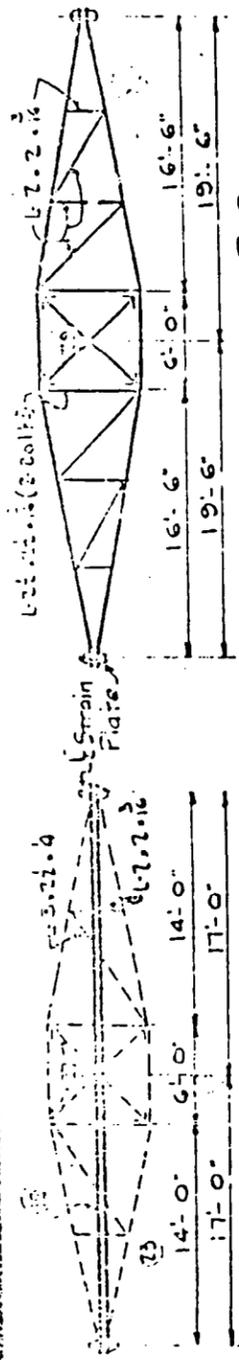
The agreed upon strategy is to submit an implementation schedule for each Task Order, when such Task Orders are identified (a common cost-saving practice is to include more than one component to be D&D under one Task Order; however, there is very little likelihood that any component will D&D under more than one Task Order).

DOE will notify the regulatory agencies when a Task Order has been assigned to the Site support Contractor in the form of a telephone call prior to or concurrent with the "Notice to Proceed", and this notification will be followed-up in written form through the submittal of a letter. The verbal and written notification will identify at least the Task Order scope, components, and the start and completion dates.

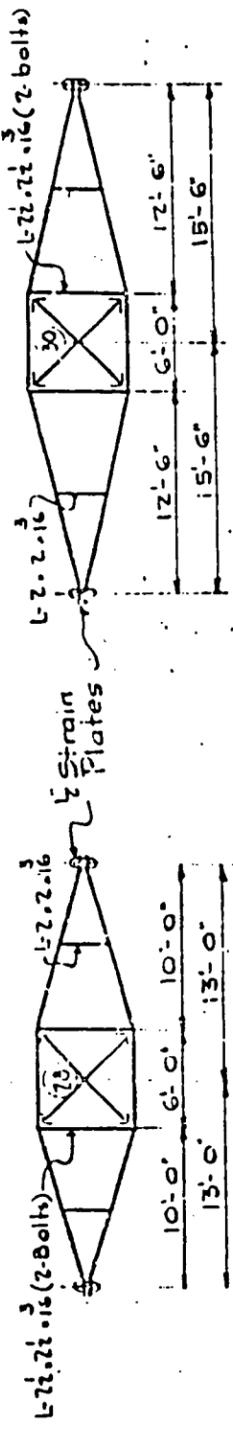
Each implementation schedule will contain three regulatory milestones: 1) Notice To Proceed; 2) Start of Field Activities; and 3) Completion of Field Activities. The schedule for the first components to be remediated, 38A and 38B, is shown below as Figure 4-1. Within 30 days from completion of D&D activities covered in a Task Order, DOE will provide the regulatory agencies with a Task Order Completion Report that will address the following issues:

- A summary description of the Task Order scope and components;
- The completion date of D&D activities;
- The location of the debris generated by the D&D activities; and
- Any documented lessons learned from the Task Order implementation.

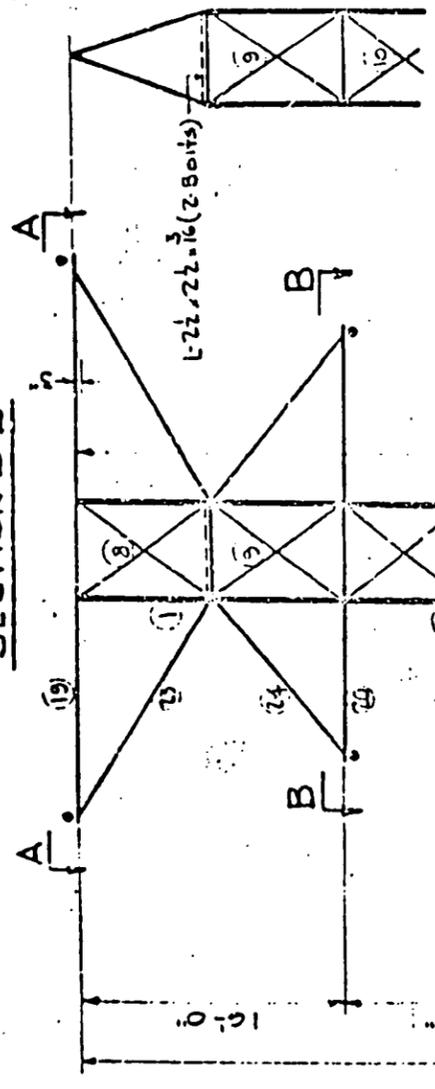
All other details will be submitted in the MSS-D&D Project Completion Report.



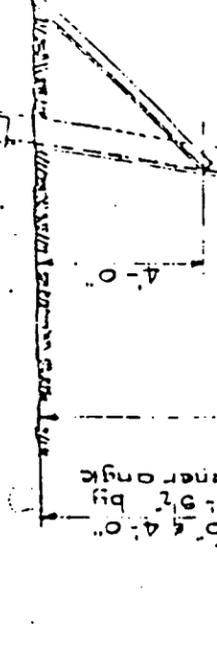
SECTION A-A



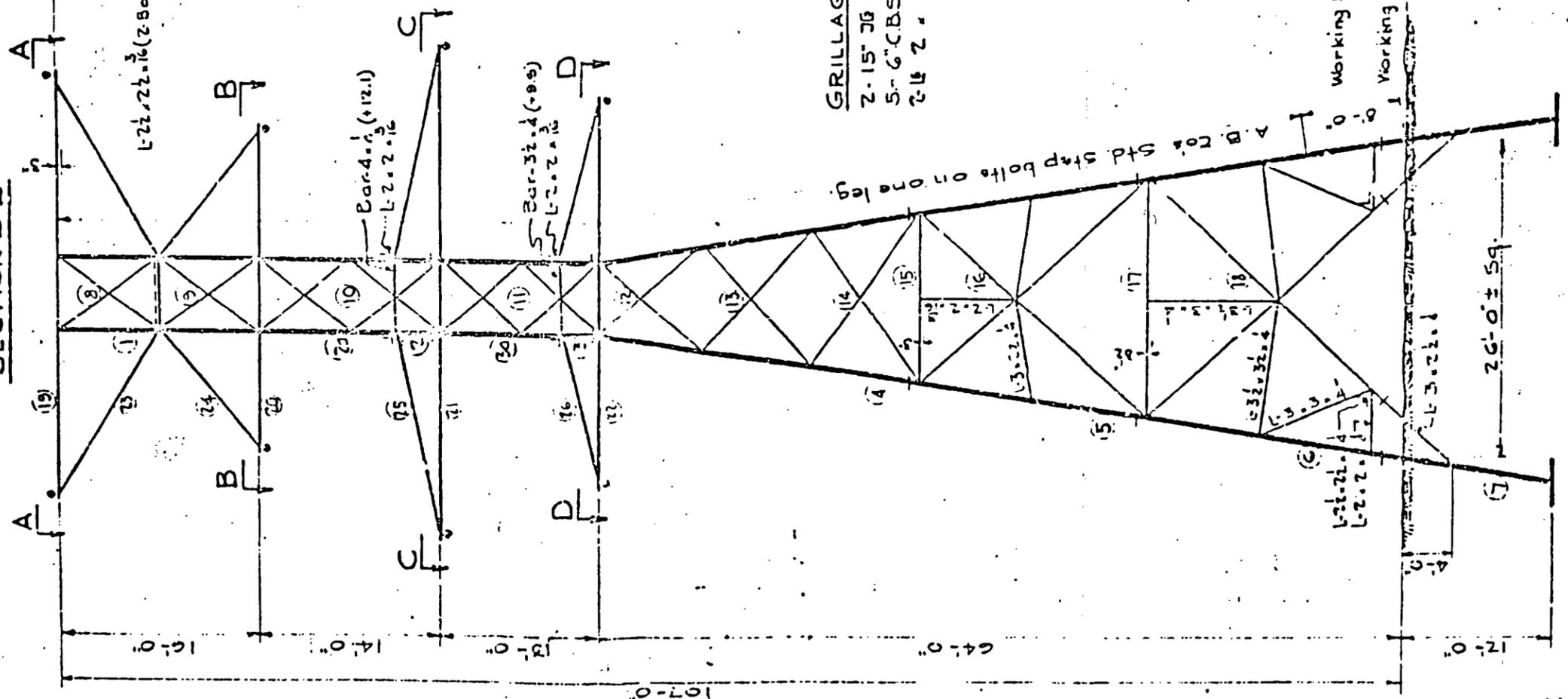
SECTION B-B



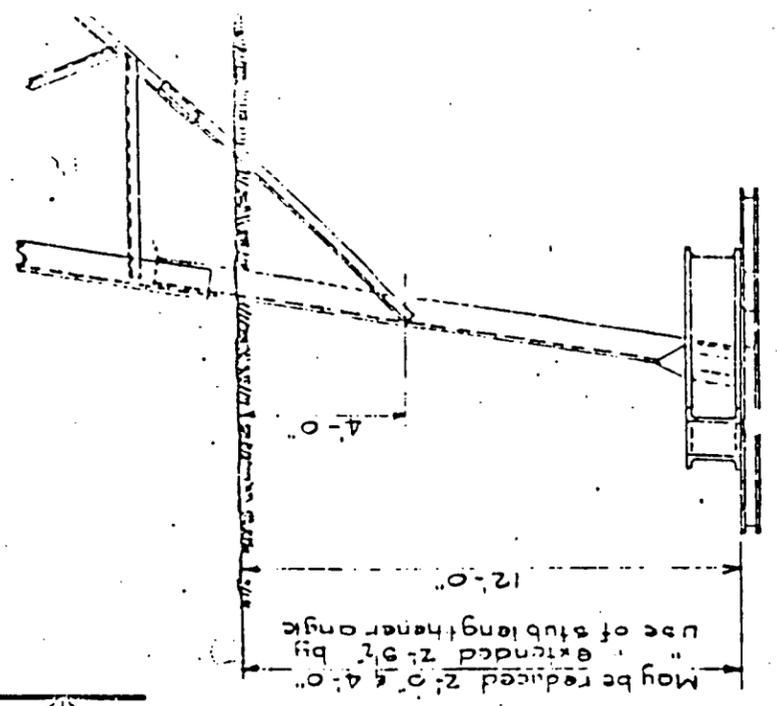
SECTION C-C



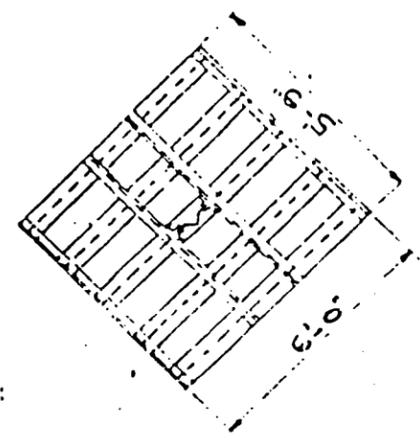
SECTION D-D



STRAIN TOWER TYPE 8C



GRILLAGE MATERIAL  
 2-15" J6 E 33.9" x 5'-9"  
 5-6" C.B.S.G 20.0" x 6'-0"  
 2-4" 2 x 4 x 5-9"



DETAIL OF ANCHOR

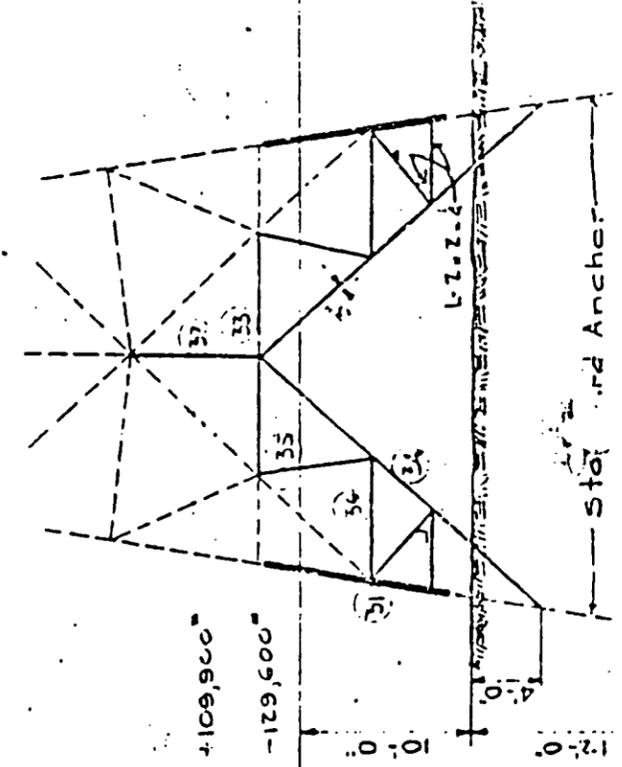


FIGURE D-24 Elevation and Sectional Views of Electrical Utility Tower

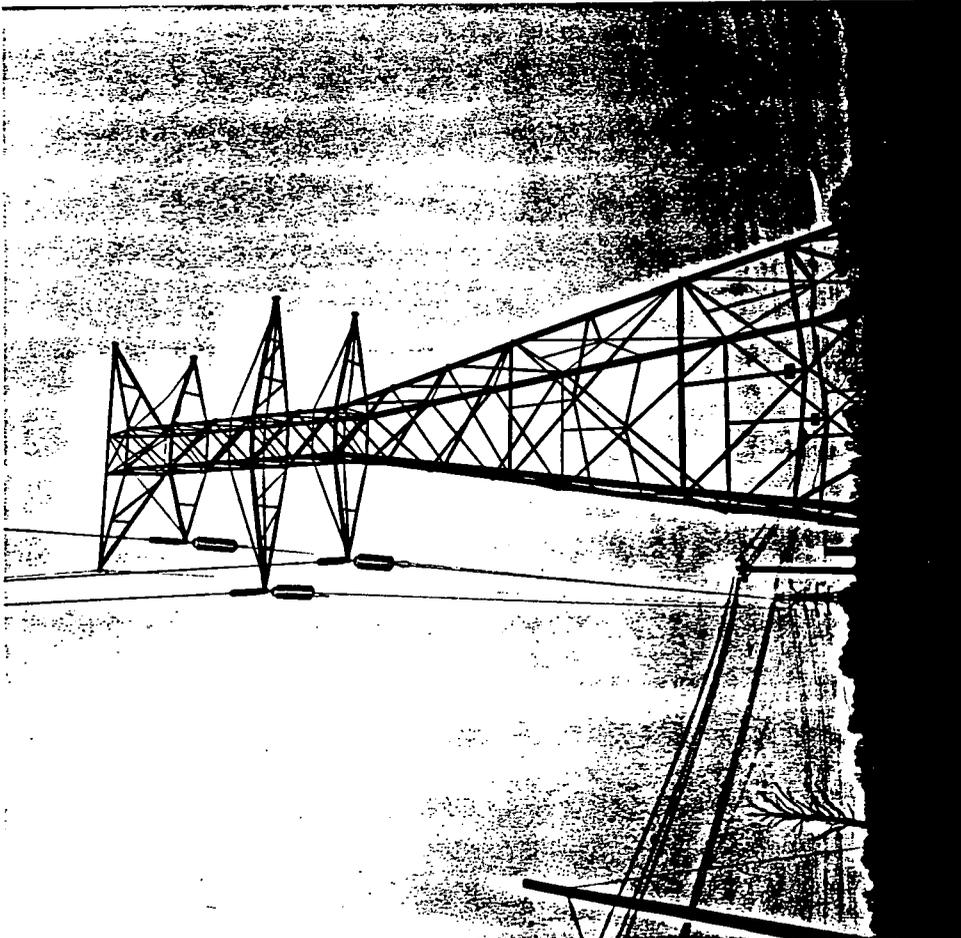


FIGURE E-40  
Electrical Utility Tower, Facing East

MISCELLANEOUS SMALL STRUCTURES D&D PROJECT  
- FERNALD, OHIO

IMPLEMENTATION SCHEDULE FOR TASK ORDER #387

Components in this Task Order are:

- 3F - Harshaw System - a multilevel open-steel structure, approximately 21 ft. x 41 ft. x 35 ft. high. (RE: Section 3.6 of Implementation Plan)
- 3G - Refrigeration Building - a structural steel framed building, approximately 44 ft. x 16 ft. x 15 ft. high. (RE: Section 3.7 of Implementation Plan)
- 24B - Railroad Engine House - a single story structure, approximately 48 ft. x 28 ft. x 18 ft. high. (RE: Section 3.14 of Implementation Plan)

Activity Description	Early Start	Early Finish	Dur	1998											
				MAY	JUN	JUL	AUG	SEP	OCT	NOV					
NOTICE TO PROCEED (ISSUE TASK ORDER)	04AUG98		0	7	14	21	28	5	12	19	26	2	9	16	23
FIELD REMEDIATION OF COMPONENTS 3F, 3G, AND 24B	10AUG98	30SEP98	52												
COMPLETION OF FIELD ACTIVITIES		30SEP98	0												
ISSUE TASK ORDER COMPLETION REPORT		30OCT98	0												

Project Start	11DEC97	Early Bar	MSBY	<b>OPERABLE UNIT 3 D&amp;D SCHEDULE</b> <b>MISC. SMALL STRUCTURES D&amp;D PROJECT</b> <b>COMPONENT 3F, 3G, and 24B</b>	Sheet 1 of 1
Project Finish	30OCT98	Progress Bar			
Date Date	01APR98				
Run Date	10AUG98				

© Primavera Systems, Inc.