



Department of Energy

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FEB 07 2001

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

DOE-0313-01

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Jablonowski and Mr. Schneider:

REQUEST FOR EXTENSION FOR RESPONSE TO COMMENTS ON DRAFT FINAL REMEDIAL DESIGN PACKAGE FOR THE SILOS 1 AND 2 ACCELERATED WASTE RETRIEVAL PROJECT

- References:
- 1) Letter from G. Jablonowski to J.W. Reising, "Conditional Approval of Draft Final Remedial Design Package for the Silos 1 And 2 Accelerated Waste Retrieval Project and Responses to U.S. EPA Comments," dated January 9, 2001.
 - 2) Letter from T. A. Schneider to J. W. Reising, "Comments - AWR RD Package," dated January 5, 2001.

In Reference 1, the U.S. Environmental Protection Agency (U.S. EPA) conditionally approved the Draft Final Remedial Design (RD) Package for the Silos 1 and 2 Accelerated Waste Retrieval Project (AWR), pending a revision that addresses the comments. In Reference 2, the Ohio Environmental Protection Agency (OEPA) provided comments on the Draft Final RD Package. The draft responses to the comments are enclosed.

Mr. Gene Jablonowski
Mr. Tom Schneider

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For the reasons outlined below, the Department of Energy (DOE) requests an extension of the date for submittal of a revised Draft Final RD Package incorporating the responses to all comments to April 6, 2001.

1. Several of the RD Package documents requiring revision to incorporate the U.S. EPA and OEPA comments (e.g., Process Flow diagrams, System Design Descriptions, Process Control Plan) are also components of the Balance of Plant (BOP) Final Design, which was submitted for review by Foster Wheeler Environmental Corporation (FWENC) on January 8, 2001, concurrent with receipt of the referenced comments.
2. Comments from Fluor Fernald, Inc. review of the BOP Final Design, which impact several of these same documents, are scheduled to be transmitted to FWENC for incorporation February 21, 2001. Responses to Fluor Fernald, Inc. comments and the necessary revisions to the appropriate design documents are scheduled for submittal to Fluor Fernald, Inc. by March 23, 2001.
3. Completed final design in the most time efficient manner, the most logical, and effective means of utilizing Fluor Fernald, Inc. and FWENC resources is to produce and submit a single revision to necessary design documents incorporating both Fluor Fernald, Inc. and the U.S. EPA/OEPA comments. The alternative would be to divert the resources focused on finalization of the BOP final design to produce a revision incorporating the U.S. EPA and OEPA comments. A second revision to the same documents would then need to be produced addressing comments from Fluor Fernald review of the BOP Design. RD Package documentation impacted by this second revision would then need to be either resubmitted to the U.S. EPA and OEPA for review or be submitted as several Document Control Numbers (DCN) if RD Package is approved prior to familiarization of BOP comment response.
4. DOE and Fluor Fernald, Inc. have reviewed all of the referenced comments. A draft Response to Comments document is enclosed with this letter. Comments that require revision to FWENC design documents are being integrated with Fluor Fernald, Inc., comments to be transmitted to FWENC for incorporation. Revisions to Draft Final RD Package as a result of incorporating the referenced U.S. EPA and OEPA comments, as well as revisions to RD Package Documentation resulting from Fluor Fernald BOP Final Design comments, will be transmitted to the U.S. EPA and OEPA by April 6, 2001.

The DOE is confident that the approach outlined above represents the most efficient means of assuring timely finalization of the design, and associated RD package documentation, for the AWR Project.

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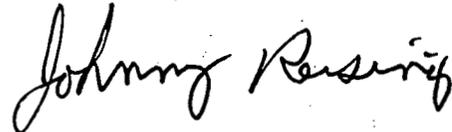
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Mr. Gene Jablonowski
Mr. Tom Schneider

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If you have any questions, please contact Nina Akgündüz at (513) 648-3110.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Akgündüz

Enclosure

cc w/enclosure:

S. Fauver, EM-31/CLOV
N. Akgündüz, OH/FEMP
T. Schneider, OEPA-Dayton (three copies of enclosures)
M. Schupe, HSI GeoTrans
F. Hodge, Tetra Tech
AR Coordinator, Fluor Fernald, Inc./78

cc w/o enclosure:

J. Lorence, OH/FEMP
A. Murphy, OH/FEMP
A. Tanner, OH/FEMP
J. Saric, USEPA-V, SRF-5J
R. Vandegrift, ODH
D. Carr, Fluor Fernald; Inc./2
R. Fellman, Fluor Fernald, Inc./52-4
T. Hagen, Fluor Fernald, Inc./65-2
S. Hinnefeld, Fluor Fernald, Inc./31
D. Nixon, Fluor Fernald, Inc./52-4
T. Walsh, Fluor Fernald, Inc./46
ECDC, Fluor Fernald, Inc./52-7

**SILOS 1 AND 2 ACCELERATED WASTE RETRIEVAL PROJECT
REMEDIAL DESIGN PACKAGE**

Draft Final, November 2000

Ohio EPA Comments

Process Description

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.0 Pg #: 13 Line #: na Code: C
Original Comment #:

Comment: The document states that the condensate in the hold up tank is held for as much as 40 days. What is the minimum holding time?

Response: If the condensate is to be transferred to filtrate tanks for recycle to the TTA, no holding time is required. Discharge of condensate to the AWWT will be utilized primarily during RCS Phase 1 operation. The 40 day maximum holding time was developed based upon worst-case assumptions during ALARA analysis for the AWR project. The actual holding time required prior to transfer of a batch of condensate to the AWWT will be dependant upon factors including the radon levels in the air being sent to the RCS, and the amount of radon actually absorbed by the condensate. The RCS design includes two 3000 gallon hold-up tanks so that one tank can be online to receive condensate while the other is being allowed to decay as required prior to transfer to the AWWT.

2. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.4 Pg #: 19 Line #: na Code: C
Original Comment #:

Comment: The first bullet in this section sets a alarm limit for the difference in water flow to and from the silos at 25%. What is the basis for 25%? Considering the volume of water being used to remove the silo contents a loss of 25% could result in a large environmental release.

Response: The criterion of 25% difference in water flow to and from the silos was selected to initiate shutdown of water addition in time to avoid accumulation of 'excess' water in the silo while avoiding frequent shutdown due to minor flow fluctuations. As described in the referenced section of the RD Package, the water flows to and from the silo will be continuously monitored by the process control system. The system will automatically shut down Silo waste retrieval if a 25 % flow difference is identified. Therefore, accumulation of water would continue only during the time required for shutdown of the pumps to be completed.

3. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.4.A, B, C Pg #: 20 Line #: Code: C
 Original Comment #: 4
 Comment: This section is in conflict with the criteria presented in the Process Control Plan (pg.35) and Appendix D (pg 434) both of which discuss a criteria of 1inch per minute. The one inch per minute criteria is unacceptable and should be removed from the document. Such a criteria would be inconsistent based upon the level of the tank and would not provides an acceptable safety level.

Response: Comment acknowledged. The 5 gpm criterion indicated on the referenced page is correct. The Process Control Plan (page 35) and Appendix D (page 434) will be revised to be consistent.

4. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.4.A Pg #: 20 Line #: Code: C
 Original Comment #: 4
 Comment: Provide details on how the flow rate will be calculated using the continuous level meter that is to be installed in the decant sump tank.

Response: The Process Control System will receive continuous tank level data from the level monitor installed in the Decant Sump Tank. The Process Control System computer will utilize the known dimensions of the Decant Sump Tank and the rate of level increase measured by the continuous level monitor to calculate the rate of infiltration.

5. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.4.A Pg #: 20 Line #: Code: C
 Original Comment #: 4
 Comment: Again, this document does not provide the "base line flow rate" based on historical data. This rate was requested in the previous comment submittal and has not been provided. Provide the base line flow rate for the decant sump tank.

Response: The intent of the "exceeds baseline flowrate" criterion was to initiate action as soon as there is a measurable increase in infiltration rate above the current, pre-waste retrieval rate. As documented in the referenced section of the RD Package, the current rate is a very small infiltration rate, which reaches the current 70% tank capacity pump-out criterion once every 6 – 12 months. The referenced section of the RD Package will be revised to specify an initial action level of 1 gpm. As detailed in the response to OEPA Comment 7, the water management strategy has been revised to provide more rapid response to increases in infiltration of water into the Decant Sump Tank and thereby further minimize the risk of overflow.

6. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.4.A Pg #: 20 Line #: Code: C
 Original Comment #: 4
 Comment: The step suggests an increase in monitoring if an above historical flow rate is detected. Considering that continuous monitoring is supposedly occurring, please detail the monitoring that will be increased.

Response: Comment acknowledged. Tank level and infiltration rate will be monitored continuously throughout waste retrieval. In response to an increase infiltration rate, more frequent manual recording, verification, and evaluation of the continuous monitoring data will be initiated.

As detailed in the response to OEPA Comment 7, the water management strategy has been revised to provide more rapid response to increases in infiltration of water into the Decant Sump Tank and thereby further minimize the risk of overflow.

7. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.4.B Pg #: 20 Line #: Code: C
 Original Comment #: 4
 Comment: If the tank level is at 70% and the flow rate then exceeds 5 gpm the tank will fill to near capacity (95%). If the flow rate is actually 8gpm instead of 5gpm the tank will overflow before pumping can be initiated. In order to provide an acceptable safety margin for the decant sump operation, the tank must be pumped empty prior to the start of silo content removal operations and at any time it reaches 50% of capacity. The prior limit of 70% was set because of the very slow fill rate and is not an acceptable safety margin. Additionally, the 8-hour set up time to initiate pumping of the tank is unacceptable and may result in tank overflow or releases to the environment. Prior to initiating silo content removal operations the tanker should be located in close proximity to the decant sump tank and all necessary equipment ready to initiate decant sump tank pumping.

Response: The water management strategy has been revised to provide more rapid response to increases in infiltration of water into the Decant Sump Tank and thereby further minimize the risk of overflow. The sump tank will be emptied prior to initiation of waste retrieval. The use of a tanker truck for pump-out of the decant sump tank will be replaced by a hard-piped connection allowing pump-out of liquid from Decant Sump Tank to be initiated automatically based upon the continuous tank level and infiltration rate data. The current action level is 70% tank capacity. If the infiltration rate reaches 1gpm, the action level will automatically be reduced to 60%. If the infiltration rate reaches 5 gpm, addition of sluicing water will be automatically stopped, the slurry pool will be transferred to the TTA, and the action level for pump-out of the Decant Sump Tank will automatically be reduced to 50% capacity.

8. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.4.B Pg #: 20 Line #: Code: C
 Original Comment #: 4
 Comment: The document fails to detail where wastewater collected from the decant sump into the tanker will be transferred. Detail on the timely emptying of the tanker is necessary. The tanker must be able to be emptied and return to pumping expeditiously in order to prevent overflow of the decant sump tank.

Response: As detailed in the response to OEPA Comment No. 7, the design is being modified to utilize a pipe line, rather than a tanker truck, for transfer of liquid from the Decant Sump Tank. Liquid required to be removed from the Decant Sump Tank during waste retrieval operations will be pumped to one of the TTA tanks.

9. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.4.A Pg #: 20 Line #: Code: C
 Original Comment #: 4
 Comment: As stated above, the 70% pumping limit is unacceptable for operating conditions. The appropriate pumping limit is 50%.

Response: See response to OEPA Comment 7.

10. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 7.0 Pg #: 25 Line #: Code: C
 Original Comment #:
 Comment: During silo waste removal, decant water and water stored in "empty" TTA tanks are used for sluicing. During remediation decant water and extra storage will not be available for sluicing the waste out of the TTA tanks. Ensure that the future remediation facility is aware of the need to provide sluice water for the removal of waste from the TTA.

Response: Comment acknowledged. The need to provide an adequate supply of water for retrieval of silo material from the TTA has been recognized as a design criterion for the Silos 1 and 2 Full Scale Remediation Facility.

11. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 9.2 Pg #: 28 Line #: Code: C
 Original Comment #:
 Comment: Will the operator of the EMMA have any prior training or experience in operating a remote system? Although the FSMS will provide an opportunity to practice, every effort should be made to find workers experienced in remote operations.

Response: Operation of systems and equipment, including EMMA, will be controlled through specific operating procedures. The operators of EMMA, and other systems and equipment comprising the AWR facilities will be trained and qualified prior to being allowed to operate the

for these setpoints, and their impact on meeting stack discharge limits, will be submitted along with the revised draft Final RD Package:

14. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Exhibit 1.2 Pg #: 33 Line #: STACK-20-001 Code: C
 Original Comment #:
 Comment: High-high set points are not listed.

Response: Comment acknowledged. The referenced table has been modified to show both the 'high' and the 'high-high' setpoints.

15. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Exhibit 1.2 Pg #: 35 Line #: LT/LC-TNK-14-001 Code: C
 Original Comment #: 4, 13
 Comment: This set point is inconsistent with previous portions of the document which use gpm for actions. Additionally, the use of 1"/min does not provide an acceptable level of safety to prevent a release to the environment.

Response: See response to OEPA Comments 3 and 7. The referenced table has been revised to reflect alarm setpoints and alarm responses consistent with the revised water management strategy.

16. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.2.1 Pg #: 39 Line #: na Code: C
 Original Comment #:
 Comment: What is the length of time that the silos will be allowed to exhibit an overpressure situation before system shut down?

Response: See response to OEPA Comment 12. Response to correct elevated headspace pressure will be initiated automatically as soon as pressure above the high end of the target operating range is detected. Bypass dampers will open automatically at the high-high setpoint of + 0.2 inches. The RCS will be automatically shutdown at +0.45 inches..

17. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.2.1 Pg #: DWG SKFMD047 Line #: na Code: C
 Original Comment #:
 Comment: It is understood that make-up air is necessary for consistent fan operation. How will the make-up airflow be accounted for in emission estimates? Make-up air should not be used to dilute the exiting air stream, to achieve emission limits. (Same comment for Section 2.2.7).

Response: Make-up air will not be used as a dilution stream in order to achieve emission limits. Make-up air will only be introduced as required to maintain the necessary pressure in the fan exhaust header. Actual make-up air flows recorded by the process control system would allow any impact on stack concentrations to be determined.

18. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.2.1 Pg #: 44 Line #: na Code: C
 Original Comment #:
 Comment: Will radon emissions from the pressure relief valves be monitored?

Response: No emissions from the pressure relief valves will occur during routine operations. As described in the response to OEPA Comment 12, the pressure relief valve will only open in an emergency situation, at a setpoint of +2 inches water gauge. If this were to occur, working level monitors in the AWR facilities, and Silo area continuous radon monitors, will provide notification of elevated radon concentrations and trigger procedures for personnel protection and other corrective actions. The data from these monitors will also allow determination of the amount of radon released during such an emergency event.

19. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.2.2 Pg #: 45 Line #: na Code: C
 Original Comment #:
 Comment: Will the silo headspace radon concentrations continue to be measured during waste removal operations?

Response: Yes. The RCS design includes a radon sampling connection in the line between the silos and the RCS.

20. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.2.2 Pg #: 45 Line #: na Code: C
 Original Comment #:
 Comment: Will the flexible hoses be double-walled and heat traced?

Response: The supply and suction hoses used to connect Silos 1 and 2 to the RCS during Phase 1 operation will consist of flexible double-walled hose. Although some moisture is expected in the suction stream drawn from the silos, the suction lines will be equipped with a low-point condensate trap to collect any moisture that condenses in the line. Given the size of, and flow rate in, the suction and supply lines, freezing is not anticipated. Heat tracing is not required on these lines.

21. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.2.3 Pg #: 48 Line #: Code: C
 Original Comment #:
 Comment: According to this section, the method of decant sump waste retrieval is currently under development. This information should be included in the RD package. When can OEPA expect additional information?

Response: The statement referenced in this comment was a carryover from the June 2000 draft RD Package, at which time the Decant Sump Waste Retrieval System (DWRS) design was not yet finalized. The complete design of the DWRS is included in the draft final RD Package. The text identified in the comment has been modified to reference the appropriate design details.

Sampling Plan

22. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.1.3 Pg #: 59 Line #: na Code: C
 Original Comment #:
 Comment: Add note to indicate that silo residue sampling will be submitted as part of the RA Work Plan.

Response: Comment acknowledged. The text has been modified as requested.

Berm Excavation Plan

23. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 1.4 Pg #: 96 Line #: Code: C
 Original Comment #:
 Comment: The text states that depending on the results of WAC sampling, berm soils may be placed in the OSDF. There is a possibility that the current OSDF cells may be capped and unavailable due to proposed budget constraints. Is there an alternative method of disposal?

Response: If the OSDF is not available to receive berm soil, the alternative method would be offsite disposal.

Operational Environmental Controls Plan

24. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 2.4 Pg #: 119 Line #: Code: C
 Original Comment #: 40
 Comment: This was revised to state that "Two culverts cross the southern perimeter road and discharge stormwater to the PPDD; one culvert crosses the west perimeter road, draining to the Waste Pit Area Runoff Control Sump." On drawing 66FCD002 it appears as though there are three culverts crossing the southern perimeter road. One 30" RCP that carries storm water from an area north of second street, takes a bend at an existing catch basin on drainage area three and exits in the PPDD at 561.04'. The catch basin in drainage area three is 12" above final grade so no storm water from the AWR project enters the 30" RCP. On either side of this pipe there are 12 storm drains. The drain to the west drains drainage area five. Drainage area five is protected from area three by a concrete water diversion and from area seven by the perimeter concrete drain and upgradient silt fence. Additionally the drainage ditch will be further protected by silt fence installed along the contours in drainage area five (although the current drawing does not show these installed along the contour but along the ditch itself). A 12' storm drain to the east of the 30' RCP drains areas 1, 2, 3, 4, and part of 5 into the existing storm water basin. We are concerned about drainage to Paddys Run and the potential for contamination of the ground water with even the most minor release from this project. Please verify that our assessment indicated in this comment of the perimeter culverts is correct.

Response: The comment correctly assesses both the drainage to the Pilot Plant Drainage Ditch, and the measures to be in place to prevent potential for the PPDD being impacted by a release during

waste retrieval. The drainage and other controls referenced in the comment will be in place prior to the initiation of waste retrieval.

Appendix D

25. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.3.1 Pg #: 431 Line #: na Code: C
 Original Comment #:
 Comment: The use of the 1"/min criteria is unacceptable see previous comments. Additionally, the decant sump tank must be maintained below 50% capacity.

Response: See responses to OEPA Comments 3 and 7.

Drawings

26. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Drawings Pg #: Line #: Code: C
 Original Comment #: Carryover comments 21, 23, 28
 Comment: Inlet protection does not show up on the drawings as indicated in your response to comments. Please include inlet protection on CB-01, 02, 03, and 04. Please include detail per ODNR on the detail sheet (66FCD006). Include the inlet protection on the drawings on which the catch basins are indicated.

Response: Note 7 on Drawings 66 FCD002 and 66FCD003 specify that "Reinforced silt fencing is to be installed around catch basins as specified on page 125 of the ODNR Rainwater and Land Development Manual." The specification to follow Page 125 of the ODNR Manual has been added to Drawing 66FCD006 as requested.

27. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Drawing 66FCD002 Pg #: Line #: Code: C
 Original Comment #: 42, carryover comment 16
 Comment: Since this and the previous two submittals have failed to document the basis for the two sediment basins, the sediment basins in the southwest corner and associated silt fences to direct flow should be changed. The drainage area is small enough that silt fences alone should be sufficient to control sediment. This will eliminate the additional soil disturbance of sediment trap construction, the disposal of stone in the sediment traps, and the misapplication of sediment fence to direct flow thereby increasing the potential for erosion at the base of silt fences. Installation of silt fence along approximately the 572 foot contour and turning the silt fence upgradient at the ends will allow the silt fence to capture sheet flow along the southwest corner and hold and filter the water to allow sediment to settle before entering the perimeter concrete drain.

Response: Comment acknowledged. The design of the erosion controls to protecting the perimeter trench during berm excavation and waste retrieval is being modified to address the concerns identified in this comment.

U.S. EPA Comments

GENERAL COMMENTS

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

Comment: The function of the numbers on the individual pages is unclear because not all pages are numbered. If the document should have consecutively numbered pages, all pages should be numbered.

Response: Each individual page in the draft final RD Package was manually numbered in the lower left-hand corner. Apparently, some of the numbers were obscured during reproduction of some copies of the document. This error will be avoided during production of future documents.

2. Commenting Organization: U.S. EPA Commentor: U.S. EPA
 Exhibit #: 1-2 Page #: 31 through 36 Line #: NA
 Original General Comment #: 2

Comment: The abbreviations used in the instrument tag numbers in Exhibit 1-2 are not listed in the "Acronyms and Abbreviation List." This deficiency should be corrected. In addition, the instrument identification sheet is not included with Exhibit 1-2 making the exhibit difficult to follow. The instrument identification sheet should be included in the final document submitted. Finally, the "Alarm" column should clearly indicate which alarms are included rather than merely indicating a general "yes," which is misleading because not all instruments have high and low alarms. Some instruments have "high alarm" and "high-high alarm," and some have all alarm types.

Response: The abbreviations used in the instrument tag numbers are listed on the Instrumentation Identification Sheet (drawing 05FMD001) that accompanies the Piping and Instrumentation Diagrams (RD Package page 488). A reference to this drawing has been added to the Key Alarm and Setpoint Table.

The "Alarm" column identifies whether or not each component is an alarmed instrument. The process control system provides alarms for all setpoints on alarmed instruments. If both high and low setpoints are identified, then both are alarmed; if low, high and high-high setpoints are identified, then all three are alarmed.

3. Commenting Organization: U.S. EPA Commentor: U.S. EPA
 Appendixes #: A, B, and C Page #: NA Line #: NA
 Original General Comment #: 3

Comment: A number of drawings in this appendix have been revised; however, not all revisions are identified, signed, or dated. It is difficult to check the drawings for revisions or corrections because they are not identified. All revisions to the drawings should be properly

6. Commenting Organization: U.S. EPA Commentor: U.S. EPA

Section #: 2.1 Page #: 15 Line #: NA

Original Specific Comment #: 2

Comment: Exhibit 2-1 shows "Drying Fan FAN-20-003"; however, the text does not discuss the fan's function. Because this fan discharges into a line that normally would be under negative pressure, it may affect the performance of the radon control system. This fan may also prevent the silos from operating at a negative pressure. The document should be revised to include a full description of this fan as well as its functions and control.

Response: The function of the drying fan is described in the Process Control Summary (RD Package page 49) and the System Design Description (RD Package Page 422). In the event that one of the carbon beds needs to be dried in order to regain performance, the drying fan will be used to draw a take-off stream from the recirculation lines through a heater, and then circulate it through the affected carbon bed. Prior to initiating drying, the affected carbon bed will be isolated from the remaining beds.

7. Commenting Organization: U.S. EPA Commentor: U.S. EPA

Section #: 2.2 Page #: 41 Line #: NA

Original Specific Comment #: 3

Comment: The fifth paragraph states, "the pressure differential transmitter will measure the pressure . . . and will control the make up air and exhaust dampers." Similar text appears in the last two paragraphs on Page 13. Transmitters do not measure or control anything. The function of a transmitter is to transmit signals. The control function is typically performed by a controller or by a PLC. The text should be revised accordingly.

Response: Comment acknowledged. The text has been revised as recommended.

8. Commenting Organization: U.S. EPA Commentor: U.S. EPA

Section #: 4 Page #: NA Line #: NA

Original Specific Comment #: 4

Comment: None of the berm excavation drawings in Appendix A to this section have been signed or dated. Other drawings in the document (with some exceptions) are signed and include revision numbers and dates. It is difficult to determine if the drawings submitted are the latest revisions because they are not properly dated nor are revisions clearly indicated. All drawings should be signed and dated.

Response: See response to U.S. EPA Comment 3.

9. Commenting Organization: U.S. EPA Commentor: U.S. EPA

Section #: 5.1 Page #: NA Line #: NA

Original Specific Comment #: 5

Comment: This section is listed as Appendix 5.1 on the unnumbered page following the divider tab, but the exhibits are numbered as Exhibits 3-1 through 3-3 on following pages. In addition,

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Sections 5-2 through 5-5 are listed on the page following the divider tab as Appendixes. These sections should be checked and corrected for consistency as needed.

Response: The tables comprising the ARAR Compliance Matrix (RD Package Section 5.1) were extracted from a Foster Wheeler Environmental Corporation document, where they were included as Exhibits 3-1 through 3-3.

Sections 5-1 through 5-5 are included correctly in the draft final RD Package.

10. Commenting Organization: U.S. EPA Commentor: U.S. EPA
Section #: 5.3 Page #: NA Line #: NA
Original Specific Comment #: 6

Comment: The last revisions to Drawings No. 66FCD001 through 66FCD006 have not been dated or signed. Revisions to Drawing No. 11FCD010 have also not been signed or dated. All drawings in the document should be signed and dated, and all revisions should be properly identified and dated to facilitate review.

Response: See response to U.S. EPA Comment 3.