



State of Ohio Environmental Protection Agency

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Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6404

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BERNARD

Bob Taft, Governor
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Christopher Jones, Director

April 30, 2001

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Re: **COMMENTS - Draft Remedial Action Work Plan for Radon Control System (RCS) Phase 1 Operation**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's submittal, "Draft Remedial Action Work Plan for Radon Control System (RCS) Phase 1 Operation". Attached are our comments on the document.

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, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Francie Hodge, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

**OHIO EPA COMMENTS ON
DRAFT REMEDIAL ACTION WORK PLAN FOR
RADON CONTROL SYSTEM (RCS)
PHASE 1 OPERATION
February 2001**

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General Comments

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: na Pg #: na Line #: na Code: E
Original Comment #:
Comment: The document does not include line numbers which aid during the review of documents. Line numbers also facilitate quick reference during comment resolution.
Response:
Action:

2. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: na Pg #:na Line #: na Code: C
Original Comment #:
Comment: Will back-up power generation be available for phase 1 RCS operation? If not, what contingencies will be in place for loss of power scenario? What are the "fail safe" positions of valves and dampers to minimize environmental impacts during a power failure.
Response:
Action

Comments

3. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.2 Pg #: 1 Line #: na Code: C
Original Comment #:
Comment: During Phase 1 Operations, when would discharge to the stack be necessary?
Response:
Action:

4. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.2 Pg #: 1 Line #: na Code: C
Original Comment #:
Comment: The text references using "temporary flexible hose" to connect the silos to the RCS. What material will be used for these hoses?
Response:
Action:

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- 5. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.2 Pg #: 3 Line #: na Code: C
Original Comment #:
Comment: The text states that up to 500 cfm from each silo may be exhausted. Does this mean that 1000 cfm could be discharged form the stack during Phase 1 operation?
Response:
Action:

- 6. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.2 Pg #: 3 Line #: na Code: C
Original Comment #:
Comment: The referencing of the unapproved Remedial Design Package is unacceptable for this document. Either include the actual text referenced or reference approved documents.
Response:
Action:

- 7. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.3.3 Pg #: 5 Line #: na Code: C
Original Comment #:
Comment: Provide process flow and mass balance diagrams for this section.
Response:
Action:

- 8. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.3.3 Pg #: 5 Line #: na Code: C
Original Comment #:
Comment: Indicate how the "make-up air" flow will be accounted for in emmission calculations.
Response:
Action:

- 9. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.3.6 Pg #: 6 Line #: Code: C
Original Comment #:
Comment: Do the by-pass dampers by-pass the exhaust dampers and the RCS, discharging directly to the atmosphere?
Response:
Action:

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10. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.3.6 Pg #: 6 Line #: Code: C
Original Comment #:
Comment: Is back flow control provided in the event of a shut down?
Response:
Action:
11. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.3.6 Pg #: 7 & 8 Line #: Code: C
Original Comment #:
Comment: Provide larger drawings for Exhibit 1-2.
Response:
Action:
12. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.3.6 Pg #: 9 Line #: na Code: C
Original Comment #:
Comment: Positive pressure relief valve unmonitored, directly to atmosphere is not acceptable. Provide instrumentation to indicate when valve is open and/or duct to stack.
Response:
Action:
13. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.3.9 Pg #: 10 Line #: Code: C
Original Comment #:
Comment: The heating air should always be treated by the carbon beds, not discharged directly through the HEPA filters.
Response:
Action:
14. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.3.10 Pg #: 11 Line #: na Code: C
Original Comment #:
Comment: Explain how "bag-in/bag-out" technology minimizes the potential for releases.
Response:
Action:

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- 15. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.4 Pg #: 12 Line #: na Code: C
Original Comment #:
Comment: The Remedial Design Package is not approved, do not reference.
Response:
Action:

- 16. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.4.1 Pg #: 12 Line #: Code: C
Original Comment #:
Comment: Provide detailed drawings of air emissions control.
Response:
Action:

- 17. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.4.1 Pg #: 13 Line #: Code: C
Original Comment #:
Comment: State the radon emission limits that will used for this project.
Response:
Action:

- 18. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.4.1 Pg #: 13 Line #: Code: C
Original Comment #:
Comment: If fence line radon concentration increase by 0.5 pCi/L, how will operations be changed to reduce fence line concentrations?
Response:
Action:

- 19. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.4.1 Pg #: 13 Line #: Code: C
Original Comment #:
Comment: Define "selected radon monitors". How are the monitors selected?
Response:
Action:

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20. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3 Pg #:17 Line #: Code: C
Original Comment #:
Comment: The Full Scale Mockup System requires additional information, including details on how FSMS will demonstrate operability of key equipment, and when such demonstrations will be adequate to justify start-up of actual AWR equipment.
Response:
Action:
21. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4 Pg #:23 Line #: Code: C
Original Comment #:
Comment: The date for submittal of draft RAWP for Waste Retrieval Operations allows for only 29 days to include information from FSM operability demonstration. (August 1 to August 30, 2002). Revise/review milestone dates.
Response:
Action: