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3904

OCT 15 2001

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

DOE-0034-02

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

Dear Mr. Jablonowski and Mr. Schneider:

RESPONSE TO COMMENTS RECEIVED ON "DRAFT" IMPLEMENTATION PLAN FOR ABOVE-GRADE DECONTAMINATION AND DISMANTLEMENT OF OPERABLE UNIT 3 MULTI-COMPLEX

- References:
1. Letter, J.W. Reising to G. Jablonowski and T.A. Schneider, "Operable Unit 3 Multi-Complex Implementation Plan for Above-Grade Decontamination and Dismantlement," dated October 3, 2001
 2. Letter, G. Jablonowski to J.W. Reising, "Conditional Approval of Draft Multi-Complex Implementation Plan for Above-Grade Decontamination and Dismantlement," dated August 9, 2001
 3. Letter, T.A. Schneider to J.W. Reising, "Re: Comments on the Implementation Plan for Multi-Plex D&D," dated August 28, 2001

This letter transmits the responses to comments received from the United States Environmental Protection Agency and Ohio Environmental Protection Agency regarding Operable Unit 3 Multi-Plex Implementation Plan for Above-Grade Decontamination and Dismantlement activities at the Fernald Environmental Management Project.

OCT 15 2001

Mr. Gene Jablonowski
Mr. Tom Schneider

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DOE-0034-02

Please refer to the above referenced letter to ensure that your comments were adequately addressed in the October 3, 2001 submittal of the final Operable Unit 3 Multi-Plex Implementation Plan for Above-Grade Decontamination and Dismantlement.

If you have any questions, please contact John Trygier at (513) 648-3154.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Boyd

Enclosure: As Stated

cc w/enclosure:

R. Greenberg, EM-31/CLOV
J. McCloskey, EM-31/CLOV
M. Boyd, OH/FEMP
J. Trygier, OH/FEMP
T. Schneider, OEPA-Dayton (three copies of enclosure)
J. Saric, USEPA-V, SRF-5J
F. Bell, ATSDR
F. Hodge, Tetra-Tech
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
AR-Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

A. Tanner, OH/FEMP
D. Carr, Fluor Fernald, Inc./MS2
T. Hagen, Fluor Fernald, Inc./MS65-2
M. Stevens, Fluor Fernald, Inc./MS44-0
ECDC, Fluor Fernald, Inc./MS52-7

**MULTI-COMPLEX DRAFT IMPLEMENTATION PLAN FOR ABOVE-GRADE
DECONTAMINATION AND DISMANTLEMENT
USEPA AND OEPA COMMENT RESOLUTIONS**

- USEPA Comment:** Page 8 of the document states that Building 80 will be used for repackaging of nuclear metals until December 2004 but also states that the building will be made available for D&D in March 2004 after completion of facility shutdown in January through February 2003. These dates are inconsistent and should be revised.
- Response:** Agree. The text in Section 2.1 has been changed to state that the building will be made available for D&D in March 2005 after completion of facility shutdown in January-February 2005.
- OEPA Comment:** Section 1.2, Page 3, Line 18 to 21 states that four components were dismantled under the Miscellaneous Small Structures, but five are listed. Please clarify.
- Response:** Agree. The number of components dismantled under the Miscellaneous Small Structures (MSS) has been re-examined and the text in Section 1.2 has been changed accordingly. A total of nine components have been dismantled under MSS and are identified in the text.
- OEPA Comment:** Section 2.4, Page 25, Page 26 is a duplicate of page 25.
- Response:** Agree. The duplicate text has been deleted.
- OEPA Comment:** Section 3.1, Page 41, Line 29 states that "A black-extraction process was used to return the nitrate to an aqueous solution..." From the context, we infer that the correct terminology should be "back-extraction".
- Response:** This text in Section 3.1 under the "Extraction" description has been changed to read "The uranyl nitrate was returned to an aqueous solution by contacting the uranium-rich solvent with hot, deionized water, yielding a solution of uranyl nitrate."
- OEPA Comment:** Sections 3.1 and 3.23, Pages 49 and 94, Line 19-26 and 19-26. In regard to decontamination documentation of HWMU #47 and HWMU #48 secondary containment areas: The plan proposes to collect a sample of storm water, (if available) from the sump inside the secondary containment structures. This is agreeable only if the sump would collect run-off from all areas inside the containment structures. Additionally, if there is RCRA contamination inside the sump which would be in contact with the storm water, the sample may fail

rinseate standards. DOE therefore, might prefer to perform a rinse of the secondary containment structure and collect a rinseate sample.

Response: A walkdown of the HWMU 47 and 48 area was conducted by Fluor Fernald Environmental Compliance (EC) and Demolition Projects (DP). Based on the walkdown by EC and DP, a rinse of the each HWMU tank structural support foundation will be performed prior to sampling of the secondary containment area. HWMU #47 includes Tank F3E-223, HWMU #48 includes Tanks SW, SE and NE. This information will be added to the HWMU #47 and HWMU #48 text in the Implementation Plan.

OEPA Comment: Section 3.16, Page 77, Line 25-26. As a point of clarification, although initially classified as HWMU#16, the Primary Calciner was later removed from the facility's list of HWMU's (reference Ohio EPA letter of July 11, 1995).

Response: Agree. The following text from Section 3.16 on the Primary Calciner has been deleted: "Some of these wastes, such as spent solvents, contained hazardous constituents; therefore, the equipment has been classified as an HWMU".

OEPA Comment: Section 3.38, Page 113, Line 8-23. Building 80, (Plant 8 Warehouse) is an active RCRA storage unit, designated HWMU #29 and is subject to closure decontamination efforts. No decontamination of the unit's floor surface is described. A decontamination effort may not be necessary if all concrete debris is scheduled for placement in the OSDF. Please elaborate.

Response: Additional text relating to the HWMU #29 decontamination effort can be found in Section 3.38 and is identified under the titles of "HWMU #29" and "HWMU Decontamination". Additionally, the "Process Area Description" has been updated to reflect current Building 80 operations.

NOTE: The HWMU text has been enhanced throughout the Implementation Plan (i.e. HWMU components specified).

NOTE: The D&D Engineering Performance Specifications (Appendix C) have been approved as "Final" and are included in the implementation plan final document. The draft implementation plan contained these specifications in "Draft" form.