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**Ohio Field Office**  
**Fernald Environmental Management Project**  
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JAN 13 2002

Mr. James A. Saric, Remedial Project Manager  
 United States Environmental Protection Agency  
 Region V-SRF-5J  
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 Chicago, Illinois 60604-3590

DOE-0165-03

Mr. Tom Schneider, Project Manager  
 Ohio Environmental Protection Agency  
 401 East 5<sup>th</sup> Street  
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**TRANSMITTAL OF RESPONSES TO COMMENTS AND THE REVISED IMPLEMENTATION  
 PLAN TO STOCKPILE THORIUM CONTAMINATED DEBRIS FROM FACILITIES  
 DECONTAMINATION AND DISMANTLEMENT PROJECTS**

- References:
1. Letter DOE-0093-03, J. Reising to T. Schneider, "Transmittal of the Implementation Plan for Thorium Debris Stockpiling," dated December 5, 2002
  2. Letter, J. Saric to J. Reising, "Thorium Contaminated Debris Implementation Plan," dated December 19, 2002
  3. Letter, T. Schneider to J. Reising, "Conditional Approval to Stockpile Thorium Debris," dated January 2, 2003

Enclosed for your review and approval are responses to the United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA) comments and the revised Implementation Plan to stockpile thorium contaminated debris from facilities decontamination and dismantlement projects. The Implementation Plan has been revised to incorporate the comment responses.

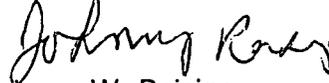
Mr. James A. Saric  
Mr. Tom Schneider

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DOE-0165-03

If you have any questions or need further information, please contact John Sattler at (513) 648-3145.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Sattler

Enclosure:

cc w/enclosure:

- N. Hallein, EM-31/CLOV
- J. Sattler, OH/FEMP
- V. Taylor, OH/FEMP
- T. Schneider, OEPA-Dayton (three copies total of enclosure)
- G. Jablonowski, USEPA-V, SRF-5J
- F. Bell, ATSDR
- M. Cullerton, Tetra-Tech
- M. Shupe, HSI GeoTrans
- R. Vandegrift, ODH
- AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

- R. Greenberg, EM-31/CLOV
- J. Trygier, OH/FEMP
- L. Barlow, Fluor Fernald, Inc./MS41
- J. Buckley, Fluor Fernald, Inc./MS52-3
- D. Carr, Fluor Fernald, Inc./MS2
- J. Chiou, Fluor Fernald, Inc./MS64
- T. Hagen, Fluor Fernald, Inc./MS9
- M. Jewett, Fluor Fernald, Inc./MS52-5
- S. Lorenz, Fluor Fernald, Inc./MS41
- T. Poff, Fluor Fernald, Inc./MS65-2
- T. Walsh, Fluor Fernald, Inc./MS52-3
- ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY  
TECHNICAL REVIEW COMMENTS ON THE IMPLEMENTATION PLAN TO  
STOCKPILE THORIUM CONTAMINATED DEBRIS FROM FACILITIES D&D PROJECTS  
(60600-PL-0003, REVISION 0)**

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT**

**GENERAL COMMENT**

Commenting Organization: U.S. EPA  
Section #: Not Applicable (NA)  
Original General Comment #: 1

Commentor: Saric  
Line #: NA

Page #: NA

**Comment:** Section 1.0 of the Implementation Plan states that the approach described in the plan will "facilitate safe storage of thorium contaminated debris with appropriate radiological controls." The plan does not discuss monitoring or control of radiological parameters. The plan should either be revised to discuss how thorium levels will be monitored and controlled in the vicinity of the stockpiles or, at a minimum, should reference other Fernald Environmental Management Project (FEMP) documents that contain this information.

**Response:** The following Fernald site documents are utilized for monitoring and controlling radiological hazards, including but not limited to thorium: 1) RM-0020, "Site Radiological Control Requirements Manual" and 2) SD-1064, "Technical Basis Air Sampling Plan for Demolition Closure Projects".

**Action:** References to the above documents were added at Section 3.3, Environmental and Radiological Controls.

**SPECIFIC COMMENTS**

Commenting Organization: U.S. EPA  
Section #: 3.3  
Original Specific Comment #: 1

Commentor: Saric  
Lines #: NA

Page #: NA

**Comment:** The text states that airborne emissions of thorium shall be mitigated through applications of "lock-down" to debris. The text should be revised to identify the types of "lock-down" that could be applied to the debris.

**Response:** Current plans are to use ACC-22P, which is a copolymer latex coating. Any alternate lock-down used in the future would be equivalent.

**Action:** Section 3.3 was revised to include ACC-22P as an example of the type of lock-down agent that will be used, and a statement that any alternate lock-down used in the future would be equivalent.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 5.0

Page #: NA

Line #: NA

Original Specific Comment #: 2

Comment: Section 5.0 should be revised to identify a specific frequency for inspection of stockpiles.

Response: Per OSDF WAC Plan requirements, a WAO representative is present at active D&D projects to conduct oversight activities, as well as at stockpiles whenever material is staged or removed. This WAO representative will include inspection of the thorium debris stockpiles as an integral part of their oversight of D&D project and stockpiling activities.

WAO also conducts weekly inspections of stockpiles sitewide, independent of whether there are projects that are actively using the piles. The thorium debris stockpiles will be included in these weekly inspections.

Action: Section 5.0 was revised to identify the two-fold approach that will be used to inspect the stockpiles: 1) During periods when the stockpiles are active, WAO will inspect the piles as an integral part of their field oversight of D&D projects and associated stockpiling activities. 2) Additionally, and during periods of stockpile inactivity, WAO will include the stockpiles in their weekly inspections of sitewide stockpiles.

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY  
COMMENTS ON THE IMPLEMENTATION PLAN TO STOCKPILE  
THORIUM CONTAMINATED DEBRIS FROM FACILITIES D&D PROJECTS  
(60600-PL-0003, REVISION 0)**

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT**

Commenting Organization: Ohio EPA  
Section #: 3.3 Pg. #: 3 Line #: Commentator: OFFO  
Code: C  
Original Comment #: 1

Comment: Section 3.3 commits to the application of "pre- and if necessary, post-placement applications of lock-down to the debris". The Ohio EPA agrees that it is desirable to use lock-down to control airborne emissions but we consider it very likely that lock-down applied prior to stockpiling will be damaged by the placement into stockpiles. The lock-down should automatically be applied when the stockpiles are completed.

Response: Agree that initial application of lock-down may be breached during placement of debris in stockpiles. Re-application will occur when breaching is noted during placement and/or in WAO inspections (see response to Comment #2), and upon completion of a stockpile.

Action: Section 3.3 was revised to delete the "if necessary" qualifier, and to clarify that post-application of lock-down will occur when breaching of the encapsulant is noted during placement and/or in WAO inspections, and upon completion of a stockpile.

Commenting Organization: Ohio EPA  
Section #: 5.0 Pg. #: 4 Line #: Commentator: OFFO  
Code: C  
Original Comment #: 2

Comment: Section 5.0 commits to inspecting the stockpiles but no schedule is given. The stockpiles should be inspected on a weekly basis and reported in the weekly fax.

Response: Per OSDF WAC Plan requirements, a WAO representative is present at active D&D projects to conduct oversight activities, as well as at stockpiles whenever material is staged or removed. This WAO representative will include inspection of the thorium debris stockpiles as an integral part of their oversight of D&D project and stockpiling activities.

WAO also conducts weekly inspections of stockpiles site wide, independent of whether there are projects that are actively using the piles. The thorium debris stockpiles will be included in these weekly inspections.

Action: Section 5.0 was revised to identify the two-fold approach that will be used to inspect the stockpiles: 1) During periods when the stockpiles are active, WAO will inspect the piles as an integral part of their field oversight of D&D projects and associated stockpiling activities. 2) Additionally, and during periods of stockpile inactivity, WAO will include the stockpiles in their weekly inspections of sitewide stockpiles. Weekly inspections will be reported in the weekly fax sent from the Soil and Disposal Facility Project to EPAs.

Commenting Organization: Ohio EPA  
Section #: General Pg. #:  
Original Comment #: 3

Line #:

Commentator: OFFO  
Code: C

Comment: The Plan does not include a schedule to haul the stockpiles to the OSDF. The thorium debris should be given priority over other debris stockpiles. Load-out from the thorium piles need not take precedence over hauling directly from a D&D project to the OSDF but the thorium piles should take precedence over the OMTA Bulk Debris Transfer Area.

Response: In general, agree that stockpiled thorium debris should take precedence over load-out from the OMTA Bulk Debris Transfer Area. Please note that there may be situations when construction of thorium debris grids may be delayed to ensure worker safety in adjacent grids where non-thorium work must proceed for correct sequencing.

Action: Section 4.3 was revised to indicate that stockpiled thorium debris would take precedence over load-out from the OMTA Bulk Debris Transfer area.