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INTEGRATED SITE-WIDE PLANNING

09/08/95

OEPA DOE-FN
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COMMENTS



State of Ohio Environmental Protection Agency

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SEP 11 3 43 PM '95

George V. Voinovich
Governor

September 8, 1995

RE: DOE FEMP
MSL #531-0297
HAMILTON COUNTY
INTEGRATED SITE-WIDE PLANNING

Mr. Jack Craig, Director
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, OH 45329-8705

Dear Mr. Craig:

Ohio EPA has reviewed DOE's August 18, 1995 letter, "Proposal for Integration of Site-Wide Remedial Planning. Ohio EPA has always advocated operating site cleanup with a site-wide perspective and believes DOE's proposal has substantial merit for increased efficiency and consistency. Implementation of a site-wide perspective is critical to the success of the 10-Year Plan. The letter submitted by DOE is a good first step to implementing such an approach. Ohio EPA is concerned with the details of implementation and looks forward to a substantial delineation of the approach.

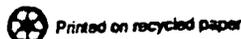
Additional detail must be provided on mechanisms to ensure that documents and actions won't be lost in re-apportioning of duties within the site structure. Addenda to previously approved Remedial Design Work Plans is necessary to clearly define when and how deliverable requirements will be met. Ohio EPA looks forward to additional detail on how disposal cell operation and material staging will be integrated with waste generation activities. More specifically, Ohio EPA has concerns with deferring K-65 silo D&D to OU3 since we believe the silos themselves will be much more like silo waste than OU3 materials. Ohio EPA believes there is basis for an administrative decision to treat the silos as a waste to be vitrified or disposed at an off-site facility rather than integrated into the OU3 waste stream. Additional discussion will be necessary on these and other issues prior to full scale implementation of the integrated approach. As state previously, Ohio EPA supports the proposed approach and anticipates its implementation at Fernald.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Terry Hagen, FERMCO Ruth Vandegrift, ODH Bob Geiger, PRC
Jim Saric U.S. EPA Manager TPSS, DERR Lisa Alexander, Geotrans

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