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July 17, 2003

Mr. Glen Griffiths  
USDOE FEMP  
P.O. Box 538705  
Cincinnati, OH 45253-8705

**RE: REVISED APPROACH TO D&D MULTI-COMPLEX**

Dear Mr. Griffiths,

Ohio EPA has reviewed DOE's July 11, 2003 letter, "Revised Approach to Decontamination and Dismantlement Sequence for the Multi-Complex Decontamination and Dismantlement Project." As expressed during several phone calls and my June 27, 2003 email to Johnny Reising, Ohio EPA has a number of concerns with the proposed revisions and their possible effects on WAC compliance and environmental safety. Our concerns center around the increased possibility for environmental releases and non-compliant material disposal created by DOE's desire for Fluor Fernald to meet a specific contract milestone.

The baseline approved method has resulted in the successful removal of nearly all the site production facilities. To change such a successful approach, in such a short-time frame, to simply address contract management problems seems unduly risky to Ohio EPA. The rigorous implementation of the WAO program has been a key factor in the implementation of the balanced approach and regulator/ community acceptance of OSDF operations. Any actions that jeopardize the integrity of the WAO program, jeopardize the project as a whole.

Following are specific concerns Ohio EPA has with the proposal:

1. The proposal calls for concurrent removal of process equipment with structural debris. This appears to be in direct contradiction to one of the guiding principles of the WAO program, that being to segregate above WAC materials before removal of compliant wastes and to minimize the commingling of AWAC and WAC compliant wastes. The concurrent removal seems to suggest intentional mixing of materials. During teleconferences, FF has discussed an approach which lead to targeted removal of process-related equipment following removal



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of the building skin. This approach would significantly reduce mixing of AWAC and WAC compliant materials. The proposal does not discuss this approach and to what extent such an approach would further reduce the commingling of waste types. The proposal should be revised to address this issue.

2. The method in the proposal greatly increases the potential for release to the environment. This is based upon the fact that during baseline methodology all process equipment is removed within the containment structure of the building. Under the proposed approach process equipment will be removed/broken while open to the atmosphere. It is also likely that broken process equipment may fall a considerable distance and release materials upon impact. The plan does not specifically address these potential release mechanisms. The plan should be revised to discuss these release pathways, what safety changes they necessitate, what environmental control changes are necessary and what monitoring changes are to be implemented.
3. The plan and telephone conference suggest a range of 3% to 25% of process related equipment remaining in a given structure. This is a very wide range. In order to better understand the potential for environmental release and AWAC detection problems at a given facility more detail is needed. The proposal should include a listing of facilities and estimated quantities and types of process related equipment being left in place for removal under the proposed method.
4. The proposal would generate well up to 20 or more times the amount of AWAC material within the pile during facility demolition (assuming the approved baseline approach removes all or less than 1% of process related equipment). However the proposal, while going into detail about management commitment to increase WAO if necessary (a commitment that should have always been in place), does not commit to any definitive additional WAO oversight. It would seem logical that such a large increase in the amount of AWAC material in a mixed pile would necessitate an increase in WAO staff. Additionally, the proposal doesn't detail how WAO will decide if more staff are needed. The entire proposal is based upon the success of visual observation of AWAC materials by WAO staff, the same staff having to find up to 20 times more unacceptable waste. The plan doesn't even discuss the addition of such visual cues as spray painting the process related equipment a different color to make it more easily recognized.
5. Because the proposal so heavily relies on visual observation during the demolition process, details are essential to developing an acceptable plan. The proposal lacks in details and is too ambiguous to properly define a path forward. For example, where the removal of the building skin and subsequent chasing of a process pipe for removal could be acceptable, demolition of the entire structure into a mixed pile would not be. The plan fails to provide these kind of details, it simply refers to concurrent removal, which could be inferred to be more like the latter than the former approach.

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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  
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