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Mr. Glenn Griffiths
United States Department of Energy
Fernald Area Office
P.O. Box 398705
Cincinnati, Ohio 45239-8705

REPLY TO THE ATTENTION OF:

Subject: Revised Approach to Decontamination and Dismantlement Sequence for the Multi-Complex Decontamination and Dismantlement Project

Dear Mr. Griffiths:

The United States Environmental Protection Agency (U.S. EPA) received the above-referenced letter on July 11, 2003. The letter summarizes the U.S. Department of Energy's (DOE) planned modifications to the sequencing of several Decontamination and Dismantlement (D&D) steps within the Multi-Complex D&D project. Candidly, U.S. EPA is concerned that the re-sequencing of D&D steps could lead to the on-site disposal of waste that may exceed the waste acceptance criteria (WAC).

U.S. EPA shares Ohio EPA's specific concerns with the re-sequencing proposal, generally:

- concerns about the commingling of above-WAC and WAC-compliant wastes during D&D, and whether above-WAC waste can be properly segregated for off-site disposal with certainty;
- concerns about the potential for process equipment to release contaminants to the environment and/or cross-contaminate otherwise WAC-compliant materials if somehow compromised or damaged during D&D operations;
- uncertainties about the amount of process-related equipment remaining in facilities and the absence of a clear plan for identifying, marking and strategically removing such equipment prior to or during D&D;
- concerns about whether DOE is relying too heavily on visual observation to ensure WAC-compliance during D&D or while sifting through a mixed debris pile, relatively challenging circumstances; and
- uncertainties regarding whether WAO staff can adequately and safely perform their duties under this re-sequencing proposal, and whether worker safety, radiological control, and waste acceptance requirements can actually be ensured.

As DOE clearly states, the intent of this re-sequencing is to gain cost and schedule efficiencies, although likely at WAO's expense. The potential for compromising the integrity of the OSDF and jeopardizing community and regulator acceptance of OSDF operations does not support modification of the baseline approved method. Therefore, U.S. EPA disapproves this re-sequencing proposal letter. If you have any questions or concerns, please contact me at (312) 886-4591.

Sincerely
E. Jablonowski
Gene Jablonowski
Project Manager
Federal Facilities Section
Superfund Division

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