



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 5  
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 CHICAGO, IL 60604-3590

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 LOG E-0125

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FILE: 6446.561 SR-6J

REPLY TO THE ATTENTION OF:

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NOV 06 2003

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

Subject: Draft Heel and Decant Sump Tank Sludge Removal Plan for the  
 Accelerated Waste Retrieval Project

Dear Mr. Griffiths:

The United States Environmental Protection Agency (EPA) received the above-referenced document, dated October 7, 2003, on October 8, 2003. The document outlines the equipment and process sequence for removal of the "heel" of Silos 1 and 2 material remaining in the Silos following bulk waste retrieval. The document also addresses removal of sludge from the Decant Sump Tank.

The document is unclear on how the remotely operated vehicle (ROV) will be placed into Silos 1 and 2, and how the ROV can be retrieved in the event of equipment failure. Therefore, EPA disapproves the document; EPA's specific comments are enclosed. If you have any questions or concerns, please contact me at (312) 886-4591.

Sincerely,

Gene Jablonowski  
 Project Manager  
 Federal Facilities Section  
 Superfund Division

Enclosure

cc: Tom Schneider, OEPA-SWDO  
 Johnny Reising, U.S. DOE-Fernald  
 Sally Robison, U.S. DOE-HDQ  
 Jamie Jameson, Fluor Fernald  
 Terry Hagen, Fluor Fernald  
 Tim Poff, Fluor Fernald

ENCLOSURE

TECHNICAL REVIEW COMMENTS ON  
"HEEL AND DECANT SUMP TANK SLUDGE REMOVAL PLAN FOR THE ACCELERATED WASTE  
RETRIEVAL PROJECT"

FERNALD CLOSURE PROJECT

(One Page)

TECHNICAL REVIEW COMMENTS ON  
HEEL AND DECANT SUMP TANK SLUDGE REMOVAL PLAN FOR  
THE ACCELERATED WASTE RETRIEVAL PROJECT

FERNALD CLOSURE PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA  
Section #: 3.3.4

Page #: 3-4

Commentor: Jablonowski  
Line #: Not Applicable

(NA)

Original Specific Comment #: 1

Comment: The text states that "during decant tank cleaning operations, ventilation can also be provided by the Radon Control System (RCS) as needed." It is not clear whether any other types of ventilation systems are available for the decant tank in the event that the RCS cannot be used. The text should be revised to clarify this issue.

Commenting Organization: U.S. EPA  
Section #: 6.0

Page #: 6-1

Commentor: Jablonowski  
Line #: NA

Original Specific Comment #: 2

Comment: The text discusses use of a remotely operated vehicle (ROV) for heel removal. It is not clear how large this ROV is or how it will be deployed in a silo. The silo openings are rather small to accommodate the ROV and all the attachments listed, as well as ensuring proper placement and orientation. In addition, the text states that the ROV will be equipped with a water sluicer nozzle and other attachments. The text does not specify what the sluicer nozzle discharge pressure will be or whether the ROV will have adequate mass to resist the force of the sluicer nozzle. The text should be revised to discuss these issues.

Commenting Organization: U.S. EPA  
Section #: 6.1.2

Page #: 6-2

Commentor: Jablonowski  
Line #: NA

Original Specific Comment #: 3

Comment: The text discusses cable management and the use of an umbilical for the ROV. It is not clear how cable management will be performed to prevent interference with the sluicer nozzles. It is also not clear how the ROV would be retrieved in the event of equipment failure, or if the umbilical can be used to remove the ROV. The text should be revised to discuss these issues.