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MAUREEN O'CONNOR, Lt. Governor
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November 16, 2003

Mr. Glenn Griffiths
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Re: COMMENTS - Heel and Decant Sump Tank Sludge Removal Plan for the Accelerated Waste Retrieval Project

Dear Mr. Reising:

Ohio EPA has reviewed DOE's submittal, "Heel and Decant Sump Tank Sludge Removal Plan for the Accelerated Waste Retrieval Project" received on October 8, 2003. Attached are our comments on the document.

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
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Michelle Cullerton, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

**OHIO EPA COMMENTS ON:
REMEDIAL DESIGN FOR SILOS 1 AND 2 HEEL REMOVAL AND DECANT SUMP
TANK SLUDGE REMOVAL**

General Comments:

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: na Pg #: na Line #: na Code: C
Original Comment #:
Comment: The criteria for determining when enough heel has been removed is vague. What radon concentrations are necessary to turn off the RCS?
Response:
Action:

2. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: na Pg #: na Line #: na Code: C
Original Comment #:
Comment: The issues regarding heel removal are not clearly identified. The design should include clear goals, and, then how design accomplishes these goals.
Response:
Action:

3. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: na Pg #: na Line #: na Code: C
Original Comment #:
Comment: The six step approach outlined in this RD appears to generate large amounts of excess sludge water with very small amounts of waste loading. How will the excess water be handled?
Response:
Action:

4. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: na Pg #: na Line #: na Code: C
Original Comment #:
Comment: Several times throughout the document, DOE refers to using the ROV to remove heel material from the silos. Ohio EPA would like to have more information regarding this piece of equipment. Has the equipment been procured? What are its dimensions? Will the equipment be able to fit through the access points at the top of the silos or will a larger access point need to be established? Information regarding this piece of equipment is very vague.
Response:
Action:

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Specific Comments:

5. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Executive Summary Pg #: 1-1 Line #: na Code: C
 Original Comment #:
 Comment: In the last paragraph, the document states that heel removal operations could potentially be stopped when the amount of K-65 material is low enough that the RCS is not needed to control radon emissions. Later in the paragraph, it is stated the project will not stop heel removal simply because operation of the RCS is no longer required. These two statements seem to contradict each other. Please clarify.
 Response:
 Action:
6. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Executive Summary Pg #: 1-2 Line #: na Code: C
 Original Comment #:
 Comment: Para 4. If the heel material is set up to the point that the heel will not sluice, the material may break off in "chunks". How will the jet pump be able to pump "chunks" of material.
 Response:
 Action:
7. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Executive Summary Pg #: 1-2 Line #: na Code: C
 Original Comment #:
 Comment: Para. 5. It is unclear how the decant ports can be flushed effectively if one side of the port is blocked by the silo berm. If the ports are flushed from the inside out, how will the water be contained?
 Response:
 Action:
8. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.2 Pg #: 3-2 Line #: na Code: C
 Original Comment #:
 Comment: What radon emissions are necessary to discontinue RCS operation and end heel removal? What if these emissions are never met?
 Response:
 Action:

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9. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.0 Pg #: 4-1 Line #: na Code: C
Original Comment #:
Comment: The text describes modification of the Hazleton pump for heel removal and the risk of damage to the pump. Will there be a standby pump on hand in case of damage or failure of the pump during heel removal?
Response:
Action:
10. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.1 Pg #: 5-1 Line #: na Code: C
Original Comment #:
Comment: The use of the slurry jet pump appears to be designed to remove an additional 3/4" to 1-1/4 " of material. Is this step necessary?
Response:
Action:
11. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 6.0 Pg #: General Line #: na Code: C
Original Comment #:
Comment: The design insufficiently describes the ROV and its specifications.
Response:
Action:
12. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 10.1 Pg #: 10-1 Line #: na Code: C
Original Comment #:
Comment: Define the amount of sludge that is acceptable for tank removal during D & D operations.
Response:
Action:
13. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 10.1 Pg #: 10-1 Line #: na Code: C
Original Comment #:
Comment: The description for decant sump tank sludge removal is vague. No equipment is specified.
Response:
Action:

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14. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 10.1 Pg #: 10-1 Line #: na Code: C
Original Comment #:
Comment: What are some of the options for alternate treatment mentioned in this section?
Response:
Action: