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JUL 15 2004

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0334-04

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street

Dear Mr. Saric and Mr. Schneider:

RESPONSE TO COMMENTS FOR THE LABORATORY COMPLEX DECONTAMINATION AND DISMANTLEMENT PROJECT COMPLETION REPORT

In response to the referenced letter, the United States Environmental Protection Agency (USEPA) comments relating to the Laboratory Complex Decontamination and Dismantlement (D&D) Project Completion Report have been addressed.

This letter transmits the response to comments along with the Laboratory Complex (D&D) Project Completion Report Page Change Notice 1 (PCN1) to the USEPA.

Please remove the existing Project Completion Report pages affected by this change and replace them with the enclosure.

If there are any questions concerning this information, please contact Joe Neyer at (513) 648-3178.

Sincerely,

William J. Taylor
Director

FCP:Neyer

Enclosures: As Stated

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cc w/enclosures:
J. Neyer, OH/FCP
J. Sattler, OH/FCP
E. Skintik, OH/FCP
G. Jablonowski, USEPA-V, SR-6J
T. Schneider, OEPA-Dayton (three copies of enclosure)
F. Bell, ATSDR
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:
K. Johnson, OH/FCP
B. Brucken, Fluor Fernald, Inc./MS41
B. Edmondson, Fluor Fernald, Inc./MS52-0
J. Fry, Fluor Fernald, Inc./MS87
T. Hagen, Fluor Fernald, Inc./MS1
M. Jewett, Fluor Fernald, Inc./MS52-5
C. Murphy, Fluor Fernald, Inc./MS1
T. Poff, Fluor Fernald, Inc./MS65-2
D. Powell, Fluor Fernald, Inc./MS64
M. Stevens, Fluor Fernald, Inc./MS87
D. Sizemore, Fluor Fernald, Inc./MS44-S
C. West, Fluor Fernald, Inc./MS52-0
ECDC, Fluor Fernald, Inc./MS52-7

LABORATORY COMPLEX PROJECT COMPLETION REPORT
FERNALD CLOSURE PROJECT RESOLUTION TO USEPA COMMENTS

Comment: Section 1.1, Pages 1 and 2 – The text refers to 1st Street and the controlled and uncontrolled sides of the site in order to describe the locations of the Laboratory Complex. Figure 1-1 does not include these points of reference. Additionally, the figure does not show the location of Component G-008. Figure 1-1 should be revised to include these locations.

Response: Figure 1-1 has been changed to include controlled/uncontrolled points of reference and the location of Component G-008.

Comment: Section 2.2.4, Page 6, Line 28 – The text states that spills of hazardous waste or polychlorinated biphenyls (PCBs) in the re-established diked area were minimal. Specific spill amounts and chemical constituents should be included in the text, or an applicable reference should be provided.

Response: Section 2.2.4, Page 6, Line 28 has been changed to read as follows: "A review of the release reports for Building 68 indicates that no known releases of hazardous wastes or PCBs were reported since the diked area was re-established. Two releases from sample containers being staged for segregation and disposition were reported in July and November 2002. In both cases, the quantity released was very small (less than one ounce was reported in July) and the spills were quickly cleaned up."

Comment: Section 3.0, Pages 8 and 9 – The text states that collection and disposition of the wastewater are detailed in Section 4.2. Section 4.2 states that there was no accumulation of decontamination water. However, washdown activities for perchloric fume hoods and drain trap floors were conducted in Building 15A. The text also fails to state whether any wastewater was present in the collection sumps. The text should be revised to address the disposition of the perchloric wastewater and to indicate whether any disposal of collection sump wastewater was required.

Response: The Laboratory Building perchloric rinse water was collected and sampled for corrosivity (pH) and perchlorics. Sample results for the rinse water came negative for both corrosivity and perchlorics. The perchloric rinse water was dispositioned to the Advanced Waste Water Treatment Facility. Due to the lack of significant loose radiological contamination, surface decontamination of the Laboratory Building was not required. As such, there was no accumulation of decontamination water in the Laboratory Building and no disposal of sump wastewater. Therefore, no changes have been made to the Project Completion Report regarding this issue.

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LABORATORY COMPLEX PROJECT COMPLETION REPORT

DOCUMENT NUMBER 1789-RP-0004 (REV. 0) PCN1

PAGE CHANGES

INCLUDES:

COVER PAGE/RECORD OF REVISION

PAGE 3/4

PAGE 5/6

PAGE 7/8

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OPERABLE UNIT 3

PROJECT COMPLETION REPORT

LABORATORY COMPLEX
DECONTAMINATION AND DISMANTLEMENT

JULY 2004

FERNALD CLOSURE PROJECT
FERNALD, OHIO

U. S. DEPARTMENT OF ENERGY
FERNALD AREA OFFICE
DOCUMENT CONTROL NO. 1789-RP-0004 (REV.0) PCN1

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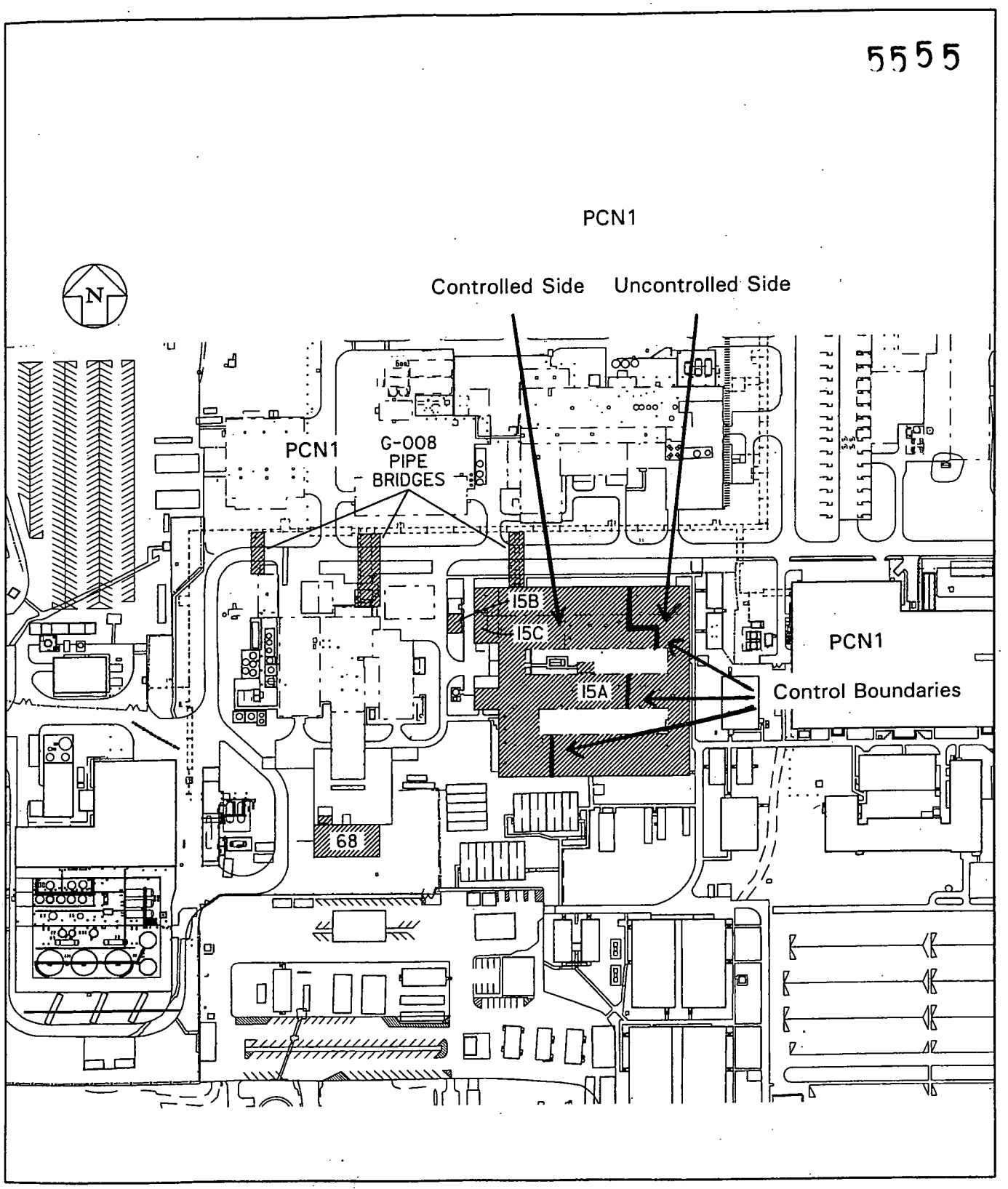

Figure 1-1 Laboratory Complex

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throughout the building. Asbestos insulation was removed from the sub-basement tank. Transite laboratory countertops, sinks and fume hoods were removed from the center, south and west wings. Exterior transite panels were removed from Room W-4. Equipment dismantlement and washdown was performed on the perchloric fume hoods and associated drain traps to ensure removal of any residual perchloric particulate. The dismantled perchloric fume hoods were left in place and taken down with the building demolition. The Building 15A structure was dismantled using a hydraulic shear. Materials generated during the dismantlement of Building 15A included the asbestos containing materials (floor tile, piping, duct, countertops, sinks, fume hoods and transite panels) piping & conduit, CMU block, doors & windows, roofing material and structural & miscellaneous steel.

Photos
Photos 1 through 5 of Attachment 1 show the following activities for the D&D of Building 15A:

1 – Building 15A asbestos abatement activity.
2 – Building 15A structural demolition activity.
3 – Building 15A structural demolition activity.
4 – Building 15A structural demolition activity.
5 – Building 15A structural demolition activity.

2.2.2 Building 15B – Laboratory Storage Building

Background
Building 15B, (Laboratory Storage Building), was a masonry block building located west of the Laboratory (15A). The building was equipped with blast relief panels located in the roof, heat detectors, explosion proof electrical wiring and copper wire grounding and had diked containment of its floor area with a self-contained sump.

Analytical Lab Services used Building 15B as a satellite accumulation area. Chemicals (mostly organic) were temporarily stored in this building. The building dimensions were 55 by 22 with a sloped roof 14.5 to 12.5 ft. No asbestos was present in this building.

Remedial Tasks
A radiological survey of Building 15B conducted prior to dismantlement verified that an initial wash down would not be required since there was no widespread loose contamination. The Building 15B structure was dismantled using a hydraulic shear. Materials generated during the dismantlement of Building 15B included piping & conduit, doors & windows, CMU block and structural & miscellaneous steel.

Photos
There were no photos available of the Building 15B demolition activity.

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removal. The HWMU No. 33 herculite sheeting and pipe was dismantled and containerized for disposition to the OSDF. The Building 68 structure was dismantled using a hydraulic shear. Materials generated during the dismantlement of Building 68 included piping & conduit, asbestos containing materials (floor tile, mastic & interior/exterior transite panels), doors & windows and structural & miscellaneous steel. All field activities have been completed to achieve closure of HWMU #33. In accordance with the 1996 Integrated RCRA/CERCLA Director's Findings and Orders, final certification of closure for this unit will be addressed I the OU3 Remedial Action Report.

Photos
Photos 6 through 9 of Attachment 1 show the following activities for the D&D of Building 68:

6 – Building 68 exterior transite removal.
7 – Building 68 exterior transite removal.
8 – Building 68 structural demolition activity.
9 – Building 68 structural demolition activity.

2.2.5 Component G-008 – Pipe Bridges

Background
The pipe bridges were steel structures that supported the steam lines and other lines required for process activities that took place in the Laboratory Complex. The steam lines and other lines associated with the Laboratory Complex covered a distance of approximately 600 linear feet and included three north to south pipe runs extending across 1st Street from the Pilot Plant and Laboratory Complexes that connected with the main east to west trunk line along 1st Street.

Remedial Tasks
Pipe bridge remediation included de-energizing all electrical utility services, disconnection and isolation of steam lines, disconnecting water/condensate lines, removal of conduit & asbestos insulated piping (approximately 600 linear feet of asbestos insulated piping) and pipe bridge structural steel demolition. Materials generated during the dismantlement of the pipe bridges included piping & conduit, and structural & miscellaneous steel.

Photos
There were no photos available of the Component G-008, Pipe Bridges demolition activity.

3.0 MATERIAL MANAGEMENT

Generated Debris
Debris generated from D&D of the Laboratory Complex buildings and components was size reduced, segregated, and containerized in accordance with the requirements identified by the Material Segregation and Containerization Criteria (MSCC).

Containerized materials requiring disposal at an off-site facility are presented in Table 3-1. This information is identified in the Site-wide Waste Information Forecasting and Tracking