



Department of Energy
Ohio Field Office
Fernald Environmental Management Project
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JUL 12 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-0294-04

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

FINAL TRANSPORTATION AND DISPOSAL PLAN FOR THE SILO 3 PROJECT

- References:
1. Letter, T. Schneider to W. Taylor, "Approval – Revised Transportation and Disposal Plan for the Silo 3 Project," dated May 10, 2004
 2. Letter, G. Jablonowski to W. Taylor, "Approval of the Revised Transportation and Disposal Plan for the Silo 3 Project," dated May 10, 2004
 3. DOE Letter, DOE-0235-04, W. Taylor to G. Jablonowski and T. Schneider, "Revised Transportation and Disposal Plan for the Silo 3 Project," dated April 21, 2004

Enclosed for your review and approval is the Final Transportation and Disposal Plan for the Silo 3 Project. As documented in the referenced letters, a draft of the plan was submitted to the United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA) in accordance with the Silo 3 Remedial Design/Remedial Action (RD/RA) Package, and was approved by both agencies with minor comments. A Response to Comments document addressing the referenced comments is enclosed, along with the final Transportation and Disposal Plan, which incorporates the necessary revisions. Please note that other minor changes have been made to the document, as noted on page iii of the Plan.

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Mr. James A. Saric
Mr. Tom Schneider

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DOE-0294-04

Consistent with recent discussions among Fluor Fernald, Inc., the Department of Energy (DOE), OEPA, and USEPA, it is Fernald's desire to maintain continuous, uninterrupted shipment of Silo 3 material, with on-site staging only as required for purposes such as arranging, certifying, and maintaining shipments. Due to the uncertainty in the outcome of DOE's ongoing efforts to resolve current NTS disposal issues with the state of Nevada, there is the potential for delay in the scheduled shipment of Silo 3 material to the Nevada Test Site (NTS) for disposal. If the shipments should be delayed, DOE will work with the USEPA and OEPA during the process of determining the most appropriate path forward for the Silo 3 project.

If you have any questions or concerns regarding the enclosed documentation, please contact John Sattler at (513) 648-3145.

Sincerely,


William J. Taylor
Director

FCP:Sattler

Enclosure: As Stated

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DOE-0294-04

Mr. James A. Saric
Mr. Tom Schneider

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cc w/enclosure:

G. Brown, OH/FCP
J. Sattler, OH/FCP
S. Beckman, Fluor Fernald, Inc./MS20
J. Saric, USEPA-V, SR-6J
T. Schneider, OEPA-Dayton (three copies of enclosure)
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

K. Johnson, OH/FCP
K. Alkema, Fluor Fernald, Inc./MS1
D. Carr, Fluor Fernald, Inc./MS1
D. Edwards, Fluor Fernald, Inc./MS84
S. Edwards, Fluor Fernald, Inc./MS52-3
M. Griffin, Fluor Fernald, Inc./MS20
J. Hughes, Fluor Fernald, Inc./MS20
M. Jewett, Fluor Fernald, Inc./MS52-5
F. Johnston, Fluor Fernald, Inc./MS52-5
S. Kaushiva, Fluor Fernald, Inc./MS52-3
C. Murphy, Fluor Fernald, Inc./MS77
ECDC, Fluor Fernald, Inc./MS52-7

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4. Commenting Organization: U.S.EPA Commentor: Jablonowski
Specific Comment #:2 Section #: 5.3 Page #: 14
Comment: The text states that once a shipment leaves FCP, the motor carrier will be responsible for providing emergency response support to local authorities in the event of any incident. Local and state authorities should be notified ahead of time as to the date and time of transport, route taken for material transport, and any other information that may be useful in conducting cleanup activities should an accident occur. The text should be revised accordingly.

Response: Primarily for security reasons, current policy for waste shipments does not provide for notification of the date, time, and route of individual waste shipments. Consistent with the procedure for other shipments to the NTS, advance notification will be provided prior to the beginning of the Silo 3 shipping campaign. The notification will include information such as the number of shipments, the type of material and packaging configuration, the projected dates for initiation and completion of shipments, and on-site contact information.

Action: The above text has been added to the plan.

5. Commenting Organization: U.S.EPA Commentor: Jablonowski
Specific Comment #:3 Section #:6.3.1.3 Page #: 18
Comment: The text states that "NTS proposes to dispose of the soft-sided containers of Silo 3 material in Area 5." It is U.S. EPA's understanding that the ISO dry van containers, containing the soft-sided IP-2 containers of Silo 3 material, will be disposed in their entirety without emptying; please clarify.

Response: Comment incorporated.

Action: The text has been changed to read: "The NTS placement plan allows for disposal of ISOs containing the IP-2 packages or removal of the IP-2 packages and direct burial. NTS currently plans on disposing the ISOs to avoid the additional operations support needed to handle the individual bags."

6. Commenting Organization: U.S.EPA Commentor: Jablonowski
Specific Comment #:4 Appendix #: B Page #: B-3
Comment: The text lists only some of the cities that a shipment of Silo 3 material will pass through along Southern Route No. 1. The text should be revised to include the following cities along this route: Springfield, Missouri; Amarillo, Texas; Albuquerque, New Mexico; and Flagstaff, Arizona. The text should be revised to remove the reference to Santa Fe, New Mexico, because the route does not pass through this city.

Response: Comment incorporated.

Action: Text changed as requested.

OHIO EPA COMMENTS

1. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.3.3.2 Motor Carrier Selection Page #: 7
 Comment: The text states, "Shipments will be consolidated to the extent practicable into larger shipping quantities or unit whenever such arrangements will result in transportation or administrative economies." Ohio EPA requests further detail on the intent of this statement. Ohio EPA expects that shipping quantities will be consistent with transportation risk assumptions and that seven (7) soft-sided containers will be placed into an ISO, one ISO per flatbed truck. And that the off-site shipment of these containers will be continuous without on-site accumulation.

Response: The intent of the statement was to say that there would be care taken to avoid shipping light loads. The number of soft-sided containers able to be transported is determined by DOT limits on the total weight able to be carried by the trailer (flatbed or van). To allow for the weight of the ISO, the van/ISO risk calculations assumed that only seven soft-sided containers could be placed in each ISO. As discussed in the response to the next comment, however, the transportation risk evaluation adequately evaluated the potential shipment of 8 soft-sided packages per ISO. DOE will configure shipments of soft-sided packages, in ISO containers, consistent with DOT regulations and with the assumptions of the transportation risk evaluation.

Action: The text has been changed to read: "Shipments will be planned in order to maximize the quantity of material per shipment whenever such arrangements will result in transportation or administrative economies, but only within the limits of the transportation risk analysis in Appendix B."

2. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Appendix B Transportation Risk Evaluation Page #: B-2
 Comment: The transportation Risk Evaluation for an ISO on a flatbed truck consists of 7 soft-sided containers per ISO. The text states, "it should be noted that an ISO container may be able to hold eight soft-sided containers per shipment," The transportation risk evaluation should also be calculated for 8 soft-sided containers.

Response: No change to text. See Page B-18, Findings and Conclusions, third bullet, which states there is no significant difference in risk between shipping seven and eight per shipment.

The number of soft-sided containers able to be transported under each scenario (van trailer or ISO/Flatbed) is limited by DOT limits on the total weight able to be carried by the trailer (flatbed or van). To allow for the weight of the ISO, the risk calculations assumed that only seven soft-sided containers could be placed in each ISO. If, weight of the ISO/flatbed, or the amount of Silo 3 material in each soft-sided container, is less than assumed in the calculations, it could be possible to place 8 soft-sided containers in each ISO.

The transportation risk calculations are impacted by the amount of Silo 3 material in each shipment, and the total number of shipments required, do not affected by the type of conveyance (ISO/flatbed or van trailer). For this reason, the calculations for eight soft-sided packages in an ISO/flatbed configuration would be identical to those for eight packages in a van trailer. Those results are included in Appendix B and demonstrate that configuration meets the 1×10^{-6} ILCR threshold condition established by the Silo 3 ROD.

Action: No change required.