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**THE WORK PLAN FOR THE OPERABLE UNIT 4 REMEDIAL ACTION PHASE
I - COMMENT RESPONSE DOCUMENT**

12/19/95

**DOE-0342-96
DOE-FN EPAS
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RESPONSES**



Department of Energy
Fernald Environmental Management Project
P. O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 648-3155

DEC 19 1995

DOE-0342-96

Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V - SRF-5J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

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

Dear Mr. Saric and Mr. Schneider:

THE WORK PLAN FOR THE OPERABLE UNIT 4 REMEDIAL ACTION PHASE I - COMMENT RESPONSE DOCUMENT

Enclosed is the Comment Response Document which addresses the comments received as a result of your review and conditional approval of the Draft Work Plan for the Operable Unit 4 Remedial Action Phase I, Revision 0 (October 1995).

If you have any additional questions or concerns, please contact Nina Akgunduz at (513) 648-3110.

Sincerely,

Johnny W. Reising
Fernald Remedial Action
Project Manager

FN:Allen

Enclosure: As Stated

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cc w/enc:

K. H. Chaney, EM-423/GTN
B. Skokan, EM-423/GTN
G. Jablonowski, USEPA-V, 5HRE-8J
Manager, TSPP/DERR, OEPA-Columbus
F. Bell, ATSDR
D. S. Ward, GeoTrans
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R. D. George, FERMCO/52-2
T. Hagen, FERMCO/65-2
AR Coordinator, FERMCO

cc w/o enc:

C. Little, FERMCO
M. Yates, FERMCO

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**Work Plan for the
Operable Unit 4 Remedial Action
Phase I, Rev. 0**

RESPONSE TO COMMENTS

**Fernald Environmental Management Project
Fernald, Ohio**



December 1995

**United States Department of Energy
Fernald, Ohio**

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**RESPONSE TO OEPA COMMENTS
ON THE WORK PLAN FOR THE OPERABLE UNIT 4
REMEDIAL ACTION PHASE I, REV. 0**

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.3.5 Page #: 2-9 Line #: 16 Code: C
Original Comment #:
Comment: Describe how stakeholder's expectations will be gathered for the Pre-Construction Alignment meetings. Will there be a stakeholder representative at the meetings?
- Response: The identification of stakeholder expectations associated with the implementation of the Operable Unit 4 remedial activities will continue to occur and be addressed through the supplemental public involvement opportunities discussed in Section 8 of the *Work Plan for the Operable Unit 4 Remedial Action Phase I, Rev. 0*. Each remedial design review package submitted to the agencies will be made available to stakeholders at the Public Environmental Information Center for inspection, in parallel to both agencies' review. In addition, a public notice is published in local newspapers announcing each document's availability and the public's opportunity to inspect the documents.
- The public has many other forums by which their concerns or expectations can be expressed to DOE (i.e. public meetings, public affairs, envoy contacts, phone calls, faxes, etc.). Stakeholder concerns or expectations will be recorded by the Fernald Residues Vitrification Plant (FRVP) projects' public affairs specialist. The public affairs specialist will attend and be a participant at the pre-construction alignment meetings, representing the stakeholders' interests.
- Action: No further action required at this time.
2. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.3.6 Page #: 2-10 Line #: 6 Code: C
Original Comment #:
Comment: How is standard and non-standard process equipment differentiated? Is there a list that specifies each piece of equipment? Please clarify.
- Response: Non-standard process equipment is being differentiated from standard process equipment by criteria such as fabrication and delivery lead times, technical complexity, and required engineering interface and oversight. A detailed equipment list will be developed for the full-scale facility, but currently, the list is preliminary and "in-work"; however, it is envisioned that items such as the melter, product forming equipment, and substations may be non-standard process equipment and thus, would be directly procured, rather than indirectly procured through a construction subcontract.
- Action: No further action required at this time.

**RESPONSE TO USEPA COMMENTS
ON THE WORK PLAN FOR THE OPERABLE UNIT 4
REMEDIAL ACTION PHASE I, REV. 0**

1. Commenting Organization: U.S. EPA Commentor: Jim Saric
Section #: General Page #: Line #: Code: C
Original Comment #:
Comment: The work plan does not mention the Vitrification Pilot Plant (VITPP) and how delays in operation may impact schedules.

Response: The *Work Plan for the Operable Unit 4 Remedial Action Phase I, Rev. 0* primarily addresses the implementation of remedial activities associated with the Site Preparation/Underground Utilities, the Silo Superstructures, and the New Radon Treatment System design packages. VITPP delays would not impact these separate and distinct activities and therefore, the work plan does not discuss how delays in VITPP operation may impact schedules.

The EPA-approved *Final Work Plan for the Operable Unit 4 Remedial Design, May 1995, (as amended)* describes the relationship of the VITPP program in Section 3.3 "Remedial Design Approach." The demonstration of the vitrification process is essential in order to establish design data and confirm design assumptions necessary for scale-up of processes and equipment to full-scale capacity.

The design of the Fernald Residues Vitrification Plant (FRVP) will be initiated based on best available information and assumptions from VITPP Phase I operations; however, specific elements of the FRVP design cannot be completed without significant technical risks, unless the VITPP Phase II operations are completed. These technical risks are primarily associated with the melter processing rate and performance, product forming equipment reliability and maintainability, off-gas treatment performance and worker radiation exposure during operations and maintenance. The completion of the FRVP prefinal design package without the benefit of completing the VITPP Phase II testing program is not expedient. Delays in the operation of the VITPP could have direct "day-for-day" impact to the completion of the FRVP prefinal design package.

The DOE is in the process of rebaselining the VITPP and the FRVP project. In accordance with this rebaselining effort, the DOE will revise and submit for EPA review and approval a revised Work Plan for the Operable Unit 4 Remedial Design. This revised document will provide an updated remedial design approach, schedule and discuss in greater detail the impacts of delays in operation of the VITPP to the FRVP project.

Action: No further action required at this time.