



State of Ohio Environmental Protection Agency

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August 24, 2004

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

Re: Disapproval - Draft Silos 1 and 2 Remedial Action Work Plan

Dear Mr. Taylor:

Ohio EPA has received the document "Draft Silos 1 and 2 Remedial Action Work Plan" dated June 29, 2004. Ohio EPA comments follow:

General Comment

- Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: na Pg #: na Line #: na Code: C
 Comment: Due to recent issues related to the disposal of the silos waste, contingencies for increased sampling and analysis of the final product need to be included in the RAWP. Sampling and analysis, as a minimum, should include the possibility for testing to ensure the product meets Universal Treatment Standards (UTS).

Specific Comment

- Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.2.8 Pg #: 10 Line #: 26 Code: C
 Comment: The text states a manual chain hoist will be used to remove defective containers. Ohio EPA is concerned regarding how a defective container would make it this far into the process. Any defects in the containers should be determined before entering the facility. Lids and fasteners should also be tested before entering the facility to assure proper fit.

It is unclear how, where, and when the containers will be inspected. It would be beneficial to have them inspected before entering the remediation facility as it will be more difficult to detect a defect after it enters the facility

via the conveyor system. Provide to Ohio EPA a comprehensive QA/QC plan that includes testing and inspection of the waste containers. The plan should include frequency of testing and the standards the containers must meet.

This document is disapproved due to the lack two milestone dates required by the September 2001, *Revised Remedial Design Work Plan for Operable Unit 4 Silos 1 & 2 Project*. The Remedial Action Work Plan must be revised to include milestone dates for 1) Submittal of the Draft RA Package; and 2) Implementation of Silos 1 & 2 Remedial Action.

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
Dale Vitale, Ohio Attorney General's Office
Mark Shupe, HSI GeoTrans
Ruth Vandergrift, ODH
Michelle Cullerton, Tetra Tech EM Inc