



Department of Energy

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Fernald Closure Project  
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OCT 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-0423-04

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

Dear Mr. Saric and Mr. Schneider:

**OPERABLE UNIT ONE (OU1) COMPLEX DECONTAMINATION AND  
DISMANTLEMENT (D&D) PHASING AND RESPONSE TO COMMENTS FOR THE  
OU1 COMPLEX IMPLEMENTATION PLAN FOR ABOVE-GRADE D&D**

- Reference:
- 1). Letter, J. A. Saric to J. W. Reising, "OU1 Complex D&D Implementation Plan," dated July 28, 2004
  - 2). Letter, T. A. Schneider to W. J. Taylor, "Re; Disapproval of Implementation Plan for D&D of the OU1 Complex," dated August 27, 2004

Regarding reference letter 2 mentioned above, the Ohio Environmental Protection Agency (OEPA) is concerned that the Railcar Loadout Building (RLB) may be dismantled while a very large quantity of material still remains to be shipped by rail. Although not specifically discussed in the Implementation Plan for the Decontamination and Dismantlement (D&D) of the Operable Unit 1 (OU1) Complex, the D&D of these facilities will be taking place in two phases. Using this phased process, the D&D of some facilities can be initiated immediately and still maintain the capability to continue loadout of SP-7 Soil using the remaining OU1 facilities during the winter months.

The first phase of D&D will begin after dryer operations have been completed. This first phase of D&D will include the dryers, the off-gas system, the water treatment system, and any other facilities not specifically needed to support railcar loadout. In general, all facilities to the west of (and including) the dryers will be removed during this first phase, along with equipment (within other facilities) not needed to support continued loadout.

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Mr. Saric  
Mr. Schneider

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Concurrent with the first phase of D&D, material will continue to be loaded into railcars utilizing the RLB, the Material Handling Building (MHB), the Railcar Prep and Liner Storage Building, and other support facilities. Once any remaining waste pit materials have been loaded out in December 2004 or shortly after, the plan is to continue to utilize these facilities to load out the above-WAC soils during the winter of 2004/2005.

The second phase of D&D (of the OU1 Complex) will take place in Spring of 2005. This phase will address all remaining facilities within the OU1 complex, including the MHB and RLB.

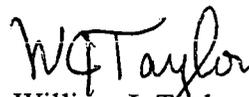
The Department of Energy (DOE) plans to directly loadout any remaining above-WAC soil outside of the MHB and RLB starting in Spring 2005. A separate plan to complete the loadout of remaining above-WAC soil will be developed and submitted for your review and approval by January 31, 2005. This plan will address OEPA's concerns regarding efficiency, airborne dispersion and handling of railcar lids during soil loadout activities outside of the RLB in details. The second phase of D&D will not start until this loadout plan is approved.

In response to the referenced letters, the regulatory agencies other comments relating to the OU1 Complex Implementation Plan for Above-Grade Decontamination and Dismantlement (D&D) have been addressed. This letter transmits the response to those comments along with the OU1 Complex Implementation Plan for Above-Grade D&D Page Change Notice 1 (PCN1).

Please remove the existing implementation plan pages affected by PCN1 and replace them with the enclosure.

If there are any questions concerning this information, please contact Ed Skintik at (513) 246-1369.

Sincerely,

  
William J. Taylor  
Director

FCP:Skintik

Enclosure: As Stated

**OPERABLE UNIT ONE IMPLEMENTATION PLAN  
FERNALD CLOSURE PROJECT RESOLUTION TO USEPA COMMENTS**

**Comment:** Table 2-1, Page 8 – Table 2-1 indicates that Building 91B, the Material Handling Building, contains process-related metals (Category C debris) that will be stored in white, metal boxes on an interim storage pad until the debris is disposed of offsite. However, the details of the interim storage (the specific storage location, runoff controls, the storage capacity, and the storage time frame) and the name and location of the off-site disposal facility are not discussed in the text of the plan. The text should be revised to present this information.

**Response:** Fluor Fernald’s intention has always been to place any material that exceeds OSDF Waste Acceptance Criteria in railcars for shipment to Envirocare. (See Paragraph 2 of Section 2.3.2 on Page 6). For wording consistency within the Implementation Plan, Table 2-1 has been changed to show Category C debris will be containerized in railcars (with no interim storage) for shipment to Envirocare. Additionally, the last sentence of Paragraph 2, Section 2.3.4 on Page 7 has been changed to read: “Debris that exceeds OSDF Waste Acceptance Criteria will be placed in railcars for shipment to Envirocare.”

**Comment:** Appendix A, Page 1 – The text states that the Operable Unit One Complex will be evaluated for the presence of asbestos-containing material (ACM). If the evaluation reveals that ACM is present, the plan should be revised to discuss the location and volume of ACM that will require abatement and the associated impact, if any, on the decontamination and dismantlement schedule.

**Response:** The following has been added as Paragraph 2 to Appendix A, Page 1 under the “Asbestos” title: “Upon evaluation of the OU1 Complex for the presence of ACM, if the evaluation reveals that ACM is present, this plan will be revised to discuss the location and volume of ACM that will require abatement and the associated impact, if any, on the decontamination and dismantlement schedule.”

**Comment:** Appendix A, Page 2 – The text discusses confirmatory sampling for debris that is to be shipped to the Nevada Test Site (NTS). The text should be revised to discuss debris sampling and analysis procedures that would be required by alternate off-site disposal facilities in the event that debris cannot be shipped to NTS for disposal.

**Response:** Fluor Fernald’s intention has always been to place any material that exceeds OSDF Waste Acceptance Criteria in railcars for shipment to Envirocare. (See Paragraph 2 of Section 2.3.2 on Page 6). For wording consistency within the Implementation Plan, Appendix A, Page 2 under the “Nevada Test Site (NTS) Confirmatory” title has been changed to read: “At this time, it is anticipated that NTS will not be a disposal facility for any OU1 debris. No sampling of any material/waste stream will be performed.”

**OPERABLE UNIT ONE IMPLEMENTATION PLAN  
FERNALD CLOSURE PROJECT RESOLUTION TO OHIO EPA COMMENTS**

- Comment:** Page 29 – There is no Figure 4-1 or page 29/30 in any copies of this Plan provided to Ohio EPA.
- Response:** Reference: Letter #DOE-0317-04, W. J. Taylor to J. A. Saric and T. Schneider, "Implementation Plan for Above-Grade Decontamination and Dismantlement of the Operable Unit 1 (OU1) Complex" made note that pages 29 and 30 had been added as an errata sheet. Additional copies of pages 29 and 30, which include Figure 4-1, are provided with this response to comments transmittal.
- Comment:** Section 2.4, Page 12, Line# 2nd from last paragraph – The text states that air emissions modeling will be performed using data collected from a final radiological survey just prior to commencing D&D. Provide the survey results and the modeled predictions to Ohio EPA.
- Response:** The following has been added as the last sentence to the 2nd from last paragraph, Page 12 of Section 2.4: "Upon completion, final survey results and the modeled predictions will be provided to the regulatory agencies."
- Comment:** Section 2.4, Page 12, Line# 2nd from last paragraph – The text states "Based on a future review of computer modeling results, it is anticipated that no supplemental air monitoring will be required for the OU1 Complex D&D activities." We agree that it is likely that modeling will predict that this project will cause negligible air emissions. That being said, there is already in place an effective air-monitoring program for the WPRAP. What is the schedule for decommissioning the WPRAP project-specific air monitors? Ohio EPA expects this air monitoring to continue until the end of the D&D Project.
- Response:** The OU1 shutdown and D&D activities will be folded into the WPRAP Project-Specific Air Sampling Plan currently in place for operations. The WPRAP project-specific air monitors will continue to remain in place and active until the end of the OU1 D&D activity.
- Comment:** Appendix A – This plan does not address sampling of concrete and other porous surfaces for Tc-99 to verify compliance with the Operable Unit 5 WAC for Tc-99. A plan should be developed to sample concrete. The floors of the MHB and the load-out bins are the most likely surfaces to be contaminated with Tc-99. Other areas should be evaluated based on process knowledge for the potential to be contaminated with Tc-99. Cores should be obtained and Tc-99 activities should be measured as a function of depth below the surface of the concrete. The data should be used to calculate the WPRAP D&D Projects total Tc-99 mass-loading to the OSDF. The concrete should not be placed in the OSDF until after WAO has determined that the total Tc-99 mass including the contribution from the WPRAP D&D meets the requirements of the OU5 Rod.
- Response:** The following has been added to Appendix A under the "Technetium 99" heading: "Prior to D&D activities, the Material Handling Building (91B) concrete will be analyzed for Tc-99. The floors of the load-out bins are the most likely surfaces to

**OPERABLE UNIT ONE IMPLEMENTATION PLAN  
FERNALD CLOSURE PROJECT RESOLUTION TO OHIO EPA COMMENTS (cont.)**

be contaminated with Tc-99. Other areas should be evaluated based on process knowledge for the potential to be contaminated with Tc-99 and sampling results from the load-out bins. A sampling plan will be developed, cores will be obtained and Tc-99 activities will be measured as a function of depth below the surface of the concrete. The data will be used to calculate the WPRAP D&D Projects total Tc-99 mass-loading to the OSDF. The concrete will not be placed in the OSDF until after WAO has determined that the total Tc-99 mass including the contribution from the WPRAP D&D meets the requirements of the OU5 ROD for OSDF WAC of Tc-99."

**Comment:** Section 2.3.2, Page 6, Line# last paragraph in section- The text describes three different categories of debris to be generated: non-process debris, process debris and suspect process debris. Provide a list of materials which belong in each category. Similarly, the text states that the Material Segregation and Containerization Criteria forms identifies specific materials from the Project that are known to either meet or not meet the OSDF WAC. Provide a list summarizing the information on the MSCC forms. The requests for the above information were made with the assumption that the information has already been compiled and is readily available. Please provide summary lists. It is not necessary to give us hundreds of MSCC forms.

**Response:** Performance Specification Section 01120, (Debris/Waste Handling Criteria) contains the definition for "non-process debris" and "process debris" within Part III, Section 3.2.A. The Performance Specifications are included as Appendix C of the Implementation Plan. Additionally, "suspect process debris" is debris that could potentially be identified as process debris per Specification Section 01120, Part III, Section 3.2.A.

The MSCC is a form that identifies waste debris expected to be encountered during the demolition activity. Also, this form identifies (when possible) the debris type as process or non-process. The MSCC information is used to determine if a visual inspection for residues is warranted. However, even though a type of debris may be exempt from the residue inspection (e.g. non-process piping, structural members, etc.) the debris must still be inspected for OSDF size requirements.