



Department of Energy

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OCT 27 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-0040-05

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

Dear Mr. Saric and Mr. Schneider:

**RESPONSE TO COMMENTS FOR THE MISCELLANEOUS SMALL STRUCTURES
PHASE II IMPLEMENTATION PLAN FOR ABOVE-GRADE DECONTAMINATION
AND DISMANTLEMENT AMENDMENT 1**

Reference: Letter, J. A. Saric to J. W. Reising, " Re: Misc. Small Structures Phase 2
Amendment 1 D&D," dated August 24, 2004

In response to the referenced letter, the United States Environmental Protection Agency (USEPA) comments relating to the Miscellaneous Small Structures (MSS) Phase II Implementation Plan for Above Grade Decontamination and Dismantlement (D&D) Amendment 1 have been addressed.

This letter transmits the response to comments along with the MSS Phase II Implementation Plan for Above-Grade D&D Amendment 1 Page Change Notice 1 (PCN1) to the USEPA Ohio Environmental Protection Agency (OEPA).

Please remove the existing Amendment 1 pages affected by this change and replace them with the enclosure.

Mr. James A. Saric
Mr. Tom Schneider

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

Sincerely,

for 
William J. Taylor
Director

Enclosures: As Stated

cc w/enclosures:

- J. Neyer, OH
- E. Skintik, OH
- G. Jablonowski, USEPA-V, SR-6J
- T. Schneider, OEPA-Dayton (three copies of enclosures)
- F. Bell, ATSDR
- M. Cullerton, Tetra Tech
- M. Schupe, HIS GeoTrans
- R. Vandergrift, ODH
- AR Coordinator, Fluor Fernald, Inc./MS78

w/o enclosures:

- K. Johnson, OH
- B. Edmondson, Fluor Fernald, Inc./MS64
- J. Fry, Fluor Fernald, Inc./MS65
- D. Nixon, Fluor Fernald, Inc./MS01
- M. Jewett, Fluor Fernald, Inc./MS52-5
- C. Murphy, Fluor Fernald, Inc./MS01
- F. Johnston, Fluor Fernald, Inc./MS65-2
- D. Powell, Fluor Fernald, Inc./MS64
- D. Sizemore, Fluor Fernald, Inc./MS02
- C. West, Fluor Fernald, Inc./MS52-0
- ECDC Fluor Fernald, Inc./MS52-7

**AMENDMENT#1 - MISCELLANEOUS SMALL STRUCTURES PHASE II IMPLEMENTATION PLAN
FERNALD CLOSURE PROJECT RESOLUTION TO USEPA COMMENTS**

- Comment:** Section 2.0, Page 2 – The text in Paragraph 1 states that Section 2.0 provides a summary of radiological data for the 19 additional components. However, the text in Paragraph 2 states that (1) radiological contamination is not expected to be present at nine of the structures installed or constructed after 1989 and (2) the remaining structures are in use and not available for a radiological survey. The implementation plan will need to be revised in another amendment in order to incorporate the radiological data for the 19 additional components.
- Response:** Paragraph 1 of Section 2.0 has been revised to eliminate the statement that Section 2.0 provides a summary of radiological data for the 19 additional components. Additionally, the following text has been added as the last sentence of Paragraph 2, Section 2.0: "Upon availability, the radiological characterization information will be issued with a submittal letter to the regulatory agencies."
- Comment:** Table 2-1, Page 2 – Table 2-1 indicates that Component 23B contains 440 cubic yards of Category B material. Based on the total amounts of materials listed in Table 2-1, this value appears to be a typographical error and should be 44.0 cubic yards. Table 2-1 should be revised accordingly.
- Response:** Table 2-1 inadvertently indicated that Component 23B contains 440 cubic yards of Category B material. Table 2-1 has been revised to read "44.0" cubic yards.
- Comment:** Table 2-4, Page 4 – Table 2-4 indicated that no concrete or masonry will be removed from Component 26D. However, the photograph of Component 26D presented in Appendix A indicates that this component is a masonry structure. Table 2-4 should be revised to resolve this discrepancy.
- Response:** Additionally, Tables 2-1, 2-2 and 2-3 indicate that Component 26D contains "Category E" material or concrete. Table 2-4 has been revised to indicate that concrete or masonry removal will be required for Component 26D.
- Comment:** Section 3.6, Page 5 – The text in this section indicates that the name of Component 18R is the "Outfall Lime Pit". However, other sections of the document indicate that the name of the Component 18R is the "Outfall Line Pit". The implementation plan should be revised to resolve this discrepancy.
- Response:** The correct name of Component 18R is "Outfall Line Pit". Section 3.6 has been revised to read "Outfall Line Pit".
- Comment:** Appendix A, Page 2 – The photograph of Component 18P indicates that it is the "Dissolver Oxygen Building". This name contains a typographical error. The correct name of Component 18P is the "Dissolved Oxygen Building". This photograph should be revised accordingly.
- Response:** The Component 18P photograph inadvertently indicated Component 18P as the "Dissolver Oxygen Building". This photograph has been revised to read "Dissolved Oxygen Building".

**OPERABLE UNIT THREE
MISCELLANEOUS SMALL STRUCTURES PHASE II
IMPLEMENTATION PLAN**

DOCUMENT NUMBER 1751-PL-0004 (REV. 0) PCN1

AMENDMENT 1 PAGE CHANGES

INCLUDES:

COVER PAGE/RECORD OF REVISION

AMENDMENT 1 - PAGE 2

AMENDMENT 1 - PAGE 4

AMENDMENT 1 - PAGE 5

AMENDMENT 1 APPENDIX A – PAGE 2