



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
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CHICAGO, IL 60604-3590

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FERNALD
LOG F-0153
2004 NOV 22 P 15:52
FILE: 64446.561

NOV 17 2004

REPLY TO THE ATTENTION OF:

Mr. Johnny W. Reising
United States Department of Energy
Fernald Area Office
P.O. Box 398705
Cincinnati, Ohio 45239-8705

Subject: Draft Transportation and Disposal Plan for the Silos 1 and 2 Project

Dear Mr. Reising:

The United States Environmental Protection Agency (EPA) has completed its review of United States Department of Energy's (DOE) above-mentioned draft Transportation and Disposal Plan (T&D Plan), dated September 14, 2004 and received by EPA on September 17, 2004. The T&D Plan presents a plan for transportation of treated Silo 1 and 2 material from FCP to the Nevada Test Site (NTS). The document proposes that the Silo 1 and 2 material be packaged in carbon steel containers, loaded onto flatbed trailers, and transported by truck to NTS for disposal.

On November 16, 2004, EPA approved the Draft Explanation of Significant Differences (ESD) for Operable Unit 4. The draft ESD was prepared by DOE to modify the approved remedy for OU4 to allow the option for temporary offsite storage of Silo 1, 2, and 3 materials, prior to permanent offsite disposal at the NTS or a permitted commercial disposal facility. The T&D Plan is not consistent with the draft ESD and should be revised appropriately.

EPA therefore disapproves the T&D Plan; additional general and specific comments are enclosed. If you have any questions or concerns, please contact me at (312) 886-4591.

Sincerely,

Gene Jablonowski
Project Manager
Federal Facilities Section
Superfund Division

Enclosure

- cc: Tom Schneider, OEPA-SWDO
- Johnny Reising, U.S. DOE-Fernald
- Jamie Jameson, Fluor Fernald
- Terry Hagen, Fluor Fernald
- Frank Johnston, Fluor Fernald

ENCLOSURE

TECHNICAL REVIEW COMMENTS ON
"TRANSPORTATION AND DISPOSAL PLAN
FOR THE SILOS 1 AND 2 PROJECT"

FERNALD CLOSURE PROJECT

(three pages)

Attachment to:

F-0152

Commenting Organization: U.S. EPA Commentor: Jablonowski
Section #: 4.3 Page #: 11 Line #: NA

Original Specific Comment #: 3

Comment: The text states that project-specific safety and health requirements will be developed as the details of the Silo 1 and 2 project unfold. The project-specific safety and health requirements should be developed and included in an appendix to the revised plan.

Commenting Organization: U.S. EPA Commentor: Jablonowski
Section #: 4.4 Page #: 11 Line #: NA

Original Specific Comment #: 4

Comment: The text states that packaged Silo 1 and 2 material will be staged in one or more designated and approved areas. The plan should be revised to include a time limit for staging the packaged material in staging areas.

Commenting Organization: U.S. EPA Commentor: Jablonowski
Section #: 4.5 Page #: 11 Line #: NA

Original Specific Comment #: 5

Comment: The text states that detailed project-specific radiological control requirements will be developed and incorporated into procedures and work permits. The project-specific radiological control requirements should be developed and included in an appendix to the revised plan.

Commenting Organization: U.S. EPA Commentor: Jablonowski
Section #: 4.6 Page #: 12 Line #: NA

Original Specific Comment #: 6

Comment: The text discusses security measures for loaded trailers that will be staged at FCP until their shipment off site. However, the text does not discuss the security measures that will be implemented for shipments en route to NTS. The text should be revised to discuss any security measures that will be implemented for shipments being transported from FCP to NTS, a permitted commercial disposal facility, or a temporary off-site storage facility.

Commenting Organization: U.S. EPA Commentor: Jablonowski
Section #: 5.3 Page #: 13 Line #: NA

Original Specific Comment #: 7

Comment: The text states that advance notification will be provided to state and tribal emergency response organizations before the Silo 1 and 2 material shipping campaign begins. The plan should be revised to include a table listing the names, addresses, and telephone numbers of all federal, state, local, and tribal organizations that will be notified before shipment of Silo 1 and 2 material begins.

Commenting Organization: U.S. EPA

Commentor: Jablonowski

Appendix #: B

Page #: B-2

Line #: NA

Original Specific Comment #: 8

Comment: The text states that trucks will be routed through Nebraska on the Northern Route to NTS. This statement conflicts with the description of the Northern Route on Page 5 of the plan, which indicates that the route will not pass through Nebraska. The text in Appendix B should be revised to resolve this discrepancy.