OhioEPA

State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6404

Bob Taft, Governor
Jennette Bradley, Lt. Governor
Christopher Jones, Director

FERNALD
LOG F-0056
2004 OCT 26 P 1:16
TO: Lutz, Ls

October 25, 2004

U. S. Department of Energy
Ohio Field Office
Fernald Closure Project
175 Tri-County Parkway
Springdale, Ohio 45246

RE: **ADDITIONAL COMMENTS ON D&D OF THE OPERABLE UNIT 1 COMPLEX**

Dear Mr. Taylor:

This letter provides Ohio Environmental Protection Agency additional comments on the Implementation Plan for the Above-Grade D&D of the Operable Unit 1 Complex. Upon satisfactory resolution of the attached comments, the Ohio EPA is prepared to approve Phase 1 of the D&D Plan. As described in your letter, DOE will provide the regulators a Plan for the loadout of above-WAC soils by January 31, 2005. Ohio EPA will not approve the Phase II D&D Plan until we have reviewed and approved the Above-WAC Soil Loadout Plan
Should you have any questions, please contact Tom Ontko or me.

Sincerely,

Tom Ontko

for Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Mark Shupe, GeoTrans, Inc.
Michelle Cullerton, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

Q:\ou3\OU1complexD&DPlanRtC.wpd

Ohio Environmental Protection Agency Comments on the RtC for the OU1 Complex Above-Grade D&D Plan

1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code: c
Comment: We prefer the original comment/response template. It made it easier to track the comment numbering.

2) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code:
Original Comment #: 3
Comment: Commit to reporting the air-monitoring results to Ohio EPA on a monthly basis.

3) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code:
Original Comment #: 4
Comment: The response has no details, it just re-iterates the comment.
1) Commit to a deadline for submitting the sampling plan for Tc-99 for review and approval.
2) The Plan should list a hierarchy of porous concrete surfaces where Tc-99 could potentially have penetrated the surface. A narrative should be included which justifies the ranking in the hierarchy. Attention should be given to those areas where wet materials were handled, especially the areas where wet materials were staged prior to drying.
3) The WAO determination that the concrete is WAC-compliant should be submitted for review and approval.

4) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code:
Original Comment #: 5
Comment: The original comment requested a list which classifies various components as process debris, non-process debris and suspect process debris. The response refers us to the Performance Specifications contained in the original Plan.
Provide the list as requested in our original comments.