



## State of Ohio Environmental Protection Agency

## Southwest District

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Bob Taft, Governor  
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February 8, 2005

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

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RNALD  
E-0395

**Re: Operable Unit 3 Operable Unit 4 (OU4) Complex Silos 1& 2 Implementation Plan For Above-Grade Decontamination and Dismantlement**

Dear Mr. Taylor:

Ohio EPA has reviewed the document "Operable Unit 3 Operable Unit 4 (OU4) Complex Silos 1&2 Implementation Plan For Above-Grade Decontamination and Dismantlement," received on December 16, 2004. Based upon the concerns detailed below, Ohio EPA disapproves the document.

Ohio EPA finds it difficult to review a document that is supposed to detail the decontamination and dismantlement of the entire Silos 1 and 2 complex before SSR has been started for the treatment facility. It is highly probable that the facility will undergo modifications both during final testing and operations that may substantially effect the D&D of the structure. Therefore it would seem most appropriate to revise the plan based upon actual facility operation.

The plan fails to address the issue of the probable situation where the D&D occurs at a time when the OSDF is no longer available, thus necessitating an entirely different approach to waste generation, segregation and disposal. Any future revisions should include details as needed for other disposal options.

The plan discusses substantial recycling of metals associated with the structures. However, during discussions with project staff at the February 2, 2005, it was clear that Fluor Fernald intends to dispose of all the support bridge metal in the OSDF with little to no effort spent on recycling. This is obviously an inconsistent approach with that presented in the document.

Considering DOE would prefer to initiate D&D of the silo structures and associated equipment in the near term, DOE should consider separate submittal of an Implementation Plan for these structures. Substantially more detail on the D&D

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approach including emissions controls, staging, transportation, and packaging are necessary.

Should you have any questions, please contact Kelly Kaletsky or me.

Sincerely,



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

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