



State of Ohio Environmental Protection Agency

Southwest District Office

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September 14, 2004

William J. Taylor  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

**Re: Comments: Operable Unit 3 Operable Unit 4 (OU4) Complex Silo 3  
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 Silo 3 Implementation Plan For Above-Grade Decontamination And Dismantlement", received on July 12, 2004. Please find attached Ohio EPA's comments on the document.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

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

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

**Operable Unit 3 Operable Unit 4 (OU4) Complex Silo 3 Implementation Plan For  
Above-Grade Decontamination And Dismantlement**

1.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: General Comment Pg. #: Line #:                      Code: C  
Comment: Because this document is being submitted before operation of Silo 3 remediation project, DOE should revisit and, if necessary, resubmit this document after initiation of operation when a more complete picture of the decontamination and dismantlement issues are available.

2.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 2.2                      Pg. #: 4                      Line #:                      Code: C  
Comment: The text states that radiological characterization information for Silo 3 and associated structures will not be presented in this implementation plan. Ohio EPA feels this is important information to review. Please indicate in what document this will be available.

3.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 2.3.4                      Pg. #: 8                      Line #:                      Code: C  
Comment: In Table 2-1 and numerous other portions of this document, reference is made to disposing Silo 3 materials that meet the WAC in the OSDF. Depending on when actual operations and then D&D of the Silos takes place, the OSDF may no longer be open to receive waste. As this is a known possibility, please include contingency plans for the waste if the OSDF is no longer open.

4.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 2.3.4                      Pg. #: 9                      Line #: first paragraph                      Code: C  
Comment: This paragraph states that for stockpiling debris, the strategies provided under Section 3.3.2.3 of the OU3 Integrated RD/RA Work Plan would be followed. While some generic strategies are defined, this section of the RD/RA Work Plan also states that 'project-specific storage/staging determinations will be made during design'. As this Implementation Plan is the design for Silo 3 D&D, please provide these details on stockpiling debris.

5.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 2.4                      Pg. #: 11                      Line #:                      Code: C  
Comment: The document states that supplemental radiological air monitoring will not be required. This is unacceptable to Ohio EPA, especially considering the facility has not started operation with actual silo material. DOE shall implement a supplemental radiological air monitoring program that includes both the operation of the remediation project as well as demolition and decontamination of the facility.

