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[REDACTED]
Sent: Wednesday, January 05, 2011 2:49 PM

[REDACTED]
Subject: Responses to Questions (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: FOUO

As requested.

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Caveats: NONE

Is the remedial alternatives tech memo basically a list of the alternatives that will be studied in the feasibility study?

Yes.

How much detail will the remedial alternatives tech memo go into?

All remedial alternatives to be considered for the Interim Waste Containment Structure (IWCS) operable unit (OU) will be included in the remedial alternatives technical memorandum and screened for implementability, protection of human health and the environment, and cost effectiveness. The IWCS OU is defined as the waste material (i.e., residues and other remedial action waste) that the U.S. Department of Energy placed in the IWCS.

How much more work will the FS involve?

There are five technical memoranda (TM) that will be prepared for the IWCS Feasibility Study (FS) as follows:

- Radon Assessment
- Development of Remedial Action Objectives and Applicable or Relevant and Appropriate Requirements for both the Interim Waste Containment Structure and Balance of Plant Operable Units
- Development of Waste Disposal Options and Fernald Lessons Learned
- Interim Waste Containment Structure Remedial Alternatives Technologies Development and Screening
- IWCS Exposure Assessment

The purpose of the five TMs is to encourage early public input and involvement on key technical issues that have impacts on the selection and evaluation of remedial alternatives for the IWCS OU. The information developed within the technical memorandums will be integrated in the FS report.

Where will info on cost estimates be included, in the tech memo or the FS?

Rough cost estimates will be used for preliminary screening purposes in the remedial alternatives technical memorandum and detailed cost estimates will be included in the IWCS FS.

Are the seven alternatives listed in the fact sheet the ones that will be reviewed in the remedial alternatives memo?

Yes, although we will consider input received from the community regarding additional alternatives.

Are there tech memos like this from other projects/sites that are already completed that I can look at?

No.

What is the importance of this remedial alternatives tech memo development to the public?

The remedial alternatives tech memo for the IWCS is important to the public because it will identify a range of potential remedial alternatives for the IWCS OU, one of which the Government will ultimately determine, in accordance with the requirements set forth in Federal law and regulations, is the appropriate remedial response to address the contamination in the IWCS. Those remedial alternatives that pass the initial screening will undergo a more detailed analysis in the IWCS FS Report. Once the IWCS FS is complete, the next phase of the CERCLA process will be to release a proposed plan with a preferred alternative for the IWCS.

Will the development of the remedial alternatives tech memo be done by staff or consultants?

The remedial alternatives technical memorandum will be prepared by a Government contractor and coordinated with staff. The Corps will review the final document prior to its release to the public.

What is the expected cost of the development of the remedial alternatives tech memo?

The expected cost is approximately 10% of the total cost to prepare the IWCS FS.

On a related note, I have some questions about the RAO/ARAR:

In the development of this memo, is it fair to say the process will involve the Corps setting the cleanup standards for various contaminants, as well as selecting the contaminants of concern? In other words, is the agency reviewing and establishing what will be cleaned up and to what level?

Identifying Applicable or Relevant and Appropriate Requirements (ARARs) involves determining whether a requirement is legally applicable, and if it is not legally applicable, determining whether a requirement is relevant and appropriate to the specific circumstances at the site. The Corps is required to develop ARARs in accordance with the statutory and regulatory provisions set forth in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). These statutory provisions, at CERCLA Section 121(d)(1) and (2), provide that remedial actions selected for a site must attain a degree of cleanup of hazardous substances, pollutants, and contaminants that: (1) assures protection of human health and the environment; and (2) complies with ARARs. Potential ARARs are initially set forth in the Feasibility Study. The Corps will issue a TM for public comment that will identify the potentially applicable or relevant and appropriate requirements for the contaminants being addressed at the site.

Will the development of the RAO/ARAR tech memo be done by staff or consultants?

The RAO/ARAR technical memorandum will be prepared by a Government contractor and coordinated with staff. The Corps will review the final document prior to its release to the public.

What is the expected cost of the development of the RAO/ARAR tech memo?

The expected cost is less than 10% of the total cost to prepare the IWCS FS.