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APPROVAL WITHHELD RVA17 REV 3 ADDENDUM

07/03/96

OEPA DOE-FN
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DISAPPROVAL

J-2395

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JUL 19 1996

George V. Voinovich
Governor

July 3, 1996

RE: DOE FEMP
MSL 531-0297
HAMILTON COUNTY
APPROVAL WITHHELD
RvA17 REV 3 ADDENDUMMr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

The Ohio EPA has reviewed the Addendum to Removal Action 17, Revision 3 Work Plan which was received by Ohio EPA on June 3, 1996. Although the Addendum does address the concerns raised by Ohio EPA during our review of Revision 3, the Ohio EPA still has reservations with the timing of the generation and disposal of soils and debris.

The Integrated Debris-Waste-Soil Model output reveals that from the 2nd quarter of 1999 to the third quarter of 2001, there is only one quarter where the OSDF is not "soil-poor". Open debris storage requirements for the time period from the third quarter of 1999 through the first quarter of 2003 are always in excess of 10,000 cubic yards except for two quarters of 2001. Figure 5-2 of the OU3 RI/FS shows that in the years 1999 and 2000 in excess of 600,000 cubic feet and 800,000 cubic feet respectively of concrete materials will be generated.

These facts lead the Ohio EPA to the conclusion that using an on-site crusher to reduce large blocks of concrete to a soil-like material is an implementable and practical solution to the staging problem. We offer the following considerations in support of that conclusion:

- The technology exists and has been implemented at FUSRAP sites in Ohio,
- The technology exists to control air-borne emissions from the crusher and this technology has been utilized at FUSRAP sites and at stone quarrying operations,
- The technology can accommodate the re-enforcing steel components of concrete.
- Previous cost estimates for OSDF placement are un-realistic because they do not properly account for the additional handling required to place large blocks of concrete. It is our understanding that the additional effort needed to compact around monolithic blocks as well as the additional soil testing that the regulators are likely to require have not been adequately reflected in the cost estimates.
- Solution equilibrium of leachate and concrete contaminants will be attained during the one thousand year design life of the OSDF. The equilibrium concentration of contaminants in the leachate is independent of the physical size of the concrete,
- Staging concrete will result in additional costs associated with double handling of this

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material, air borne emissions control and run-on run-off control.
We anticipate that further discussions will be necessary before resolution of this issue is achieved.

Another area of concern is the "evaluation of stockpile media" that is mentioned under the heading Existing Soil Stockpile Locations on the first page of the Addendum. Earlier versions of Removal Action 17 were intended to maintain the history of process knowledge and place of origin of the soils in the piles. It is Ohio EPA's contention that if this knowledge is lost due to the addition of uncharacterised soils to the piles, the burden of proof rests with DOE to show compliance with the WACs.

If you have any questions, please contact Tom Ontko or me

Sincerely,



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

cc: Jim Saric, U.S. EPA
Terry Hagen, FERMCO
Ruth Vandergrift, ODH
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