



Department of Energy

Ohio Field Office
Fernald Area Office

P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



2836

MAR 8 2000

Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V, SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0473-00

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

TRANSMITTAL OF RESPONSES TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS AND THE REVISED INTEGRATED REMEDIAL DESIGN PACKAGE FOR AREA 2, PHASE III PART TWO

- References:
- 1) Letter, J. Saric to J. Reising, "A2PIII Part Two IRDP," dated February 2, 2000
 - 2) Letter, T. Schneider to J. Reising, "Approval – RTC on Implementation Plan for A2PIII Part Two and DCN 20402-98," dated February 29, 2000

Enclosed for your approval are responses to the U.S. Environmental Protection Agency (U.S. EPA) comments and the final Integrated Remedial Design Package (IRDP) for Area 2, Phase III (A2PIII) Part Two. This IRDP consists of the final Implementation Plan and Design Change Notice (DCN) 20402-102, Revised Radium Excavation. The previously submitted DCN (20402-098) has been voided and the current DCN (20402-102) was generated in its place to address and incorporate responses to Ohio Environmental Protection Agency's (OEPA) comments approved on February 29, 2000 (as referenced above). The Implementation Plan has been revised to reflect and incorporate comments from the U.S. EPA and OEPA.

Mr. James A. Saric
Mr. Tom Schneider

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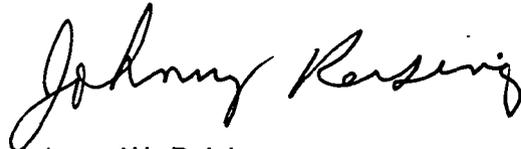
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The A2PIII Part Two project will be performed through a change order to the Area 2, Phase I Southern Waste Unit (SWU) contract, thus the technical specifications from the SWU project are applicable to A2PIII Part Two.

The Certification Design Letter (CDL) for A2PIII Part Two will be sent under separate cover later this month for early review and comment. The CDL will present the certification design, incorporating U.S. EPA and OEPA concerns as identified through their respective comments. As stated in Section 3.5 of the Implementation Plan, this early submission is intended to help expedite the certification of A2PIII Part Two, after completion of excavation and precertification, to avoid the difficulties in sampling currently being observed in the Sewage Treatment Plant deep excavation area.

If you have any questions regarding these comment responses, please contact Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

Enclosures

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Mr. James A. Saric
Mr. Tom Schneider

cc w/enclosure:

R. J. Janke, OH/FEMP
G. Jablonowski, USEPA-V, SRF-5J
T. Schneider, OEPA-Dayton (three copies of enclosures)
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
F. Hodge, Tetra Tech
AR Coordinator, Fluor Fernald/78

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cc w/o enclosure:

N. Hallein, EM-31/CLOV
K. Nickel, OH/FEMP
A. Tanner, OH/FEMP
J. Blankemeyer, Fluor Fernald/52-0
D. Carr, Fluor Fernald/2
J. Chiou, Fluor Fernald/52-0
T. Crawford, Fluor Fernald/52-0
T. Hagen, Fluor Fernald/65-2
J. Harmon, Fluor Fernald/90
S. Hinnefeld, Fluor Fernald/31
M. Jewett, Fluor Fernald/52-2
M. Rolfes, Fluor Fernald/60
T. Walsh, Fluor Fernald/65-2
ECDC, Fluor Fernald/52-7

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT IMPLEMENTATION PLAN FOR AREA 2, PHASE III PART TWO
(20460-PL-0001, REVISION B)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.1.4

Page #: 3-2

Line #: 10

Original Specific Comment #: 1

Comment: The text states that the portion of the excavation area around two large trees will be excavated to a depth of only 6 inches, whereas the rest of the area will be excavated to a depth of 30 inches. Previous borings in the area have revealed some radium contamination at-depth, and such contamination may be shielded from the precertification scan by overlying soil. The text should be revised to discuss how the U.S. Department of Energy will confirm that the limited excavation near the two trees will be adequate to fully remove contaminated soil.

Response: One boring is located near the trees within the six-inch stripping area (A2P3-RA-1). The radium-226 concentrations of the sample intervals from this boring location were all below-FRL, including the HPGe measurement collected on the surface. The other boring locations (A2P3-RA-3 and A2P3-RA-6), in reasonable proximity to the 6-inch stripping area, have above-FRL, radium-226 concentrations at a depth of only 12 inches. The deeper excavation area encompasses these boring locations, as well as the other at-depth and surface contamination areas. Based on this information, DOE feels the 6-inch depth of excavation around the trees will be adequate to attain FRLs. After the 6-inch scrape, certification of the next 6 inches of soil will confirm the full removal of contamination. The certification of the A2PIII Part Two footprint will be detailed in the forthcoming Certification Design Letter (CDL).

Note: The depth of the deeper excavation area has been adjusted to 36 inches based on Ohio Environmental Protection Agency (OEPA) comment responses.

Action: Detail the confirmation of the 6-inch stripping area in the A2PIII Part Two CDL.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 2-3 and 3-1

Page #: Not applicable (NA)

Line #: NA

Original Specific Comment #: 2

Comment: The figures indicate that radium-226 was detected at 7.3 and 6.0 picoCuries per gram (pCi/g) at a depth of 0 to 0.5 foot below ground surface (bgs); however, Table A-4 indicates that radium-226 was detected at these concentrations at a depth of 0.5 to 1 foot bgs. This discrepancy should be resolved.

Response: Comment noted. Table A-4 is correct and the figures contain a typographical error. Figures 2-3 and 3-1 will be corrected to match Table A-4.

Action: Figures 2-3 and 3-1 will be revised to correct the data for sample point 2 to correspond with the data in Table A-4.

REQUEST FOR CLARIFICATION OF INFORMATION / DESIGN CHANGE NOTICE -

WP / WO NO.: 20402	S/C NO.: FSC 614	Pg 1 OF 1	DATE 2/8/00
S/C TITLE: SOUTHERN WASTE UNITS - EXCAVATION			RCI NO.: N/A
RESPONSIBLE DISCIPLINE: E <input type="checkbox"/> M <input type="checkbox"/> C X <input type="checkbox"/> OTHER <input type="checkbox"/>	RCI/DCN TITLE: Revised Radium Excavation	DCN NO.: 20402-102	

DOCUMENTS AFFECTED	DOCUMENT NOS.	REV.	OTHER
Technical Drawing	92X-5900-X-00394	2	Drawing index

RCI - INQUIRY PRE-SCREEN FOR USQD BY PROJECT ENGINEER DCN-JUSTIFICATION, EXISTING CONDITION & REQUESTED PROPOSED CHANGE

This DCN brings into the scope of the contractor's work the excavation of the Area 2, Phase III radium area, which consists a 3 foot excavation for a volume of approximately 5080 yd³. The attached sketches show the excavation footprint and the traffic route for the haul vehicles to follow, and will be incorporated into the design package as drawings with the next package update.

All work shall be done in accordance with the Technical Specifications, including but not limited to, site preparation; surveying; excavation, loading, and transporting of material; and erosion and sediment controls.

REQUESTOR: <i>Janet Blankmeyer</i>	COMPANY: FDF	DATE: 2/8/00	FCE / PE	DATE: 2/8/00
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RESPONSE: FOR RCI IS A DCN REQ'D? NO YES FOR DCN APPROVED APPROVED AS NOTED DISAPPROVED

SEE ATTACHED SKETCHES (1 & 2 of 2)

INFORMATION ONLY

RCI - DCN ACCEPTANCE	
DESIGN ORGANIZATION APPROVAL: <i>Carlton Schroeder (PARSONS)</i>	DATE: 2/10/00
CHARGE NO. FOR CADD SERVICES TO INCORPORATE: 2CWR5	
FDF PE ACCEPTANCE & VERIFICATION THAT ALL REQUIRED REVIEWS ARE COMPLETE: (DCN ONLY) DATE: 2/10/00	
PERFORMANCE GRADE: 5	<i>Janifer Blankmeyer</i> DATE: 2/10/00
CONSTRUCTION CONCURRENCE: <i>Janifer Blankmeyer</i>	DATE: 2/10/00
PURCHASE REQUISITION REQUIRED: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	

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- ① TRAFFIC AT OSDF SUBJECT TO OSDF OPERATIONS.
- ② USE SWU EQUIPMENT WASH FACILITY.

← HAUL ROAD

SEE DWG. 92X-5900-G-00396 FOR LEGEND

STATE OF OHIO NORTH (NAD 83)

FEMP NORTH
Z=1.5672°

ALTERNATE ROUTE ONLY AS APPROVED BY CM

OSDF CONSTRUCTION AREA. SEE OSDF, PHASE II CONSTRUCTION PACKAGE

TYPE II CROSSING

RAILROAD OSDF WHEEL WASH

OSDF CELL 1

OSDF CELL 2

OSDF CELL 3

SOLID WASTE LANDFILL

WASTE PITS

SP-7 STOCKPILE AREA

BIOSURGE LAGOON

LIME SLUDGE POND

OSDF DEBRIS TRANSFER AREA

TYPE I CROSSING

IMPACTED MATERIAL HAUL ROAD

OLD NORTH ENTRANCE ROAD

SOUTH PARKING LOT

EAST PARKING LOT

EQUIPMENT WASH FACILITY ②

WOODCHIP STOCKPILE AREA

SWRB

SWRB

SEDIMENT BASIN

SOUTHERN WASTE UNITS

SITE ACCESS CONTROL POINT

OSDF BORROW AREA

SOUTH CONSTRUCTION ROAD

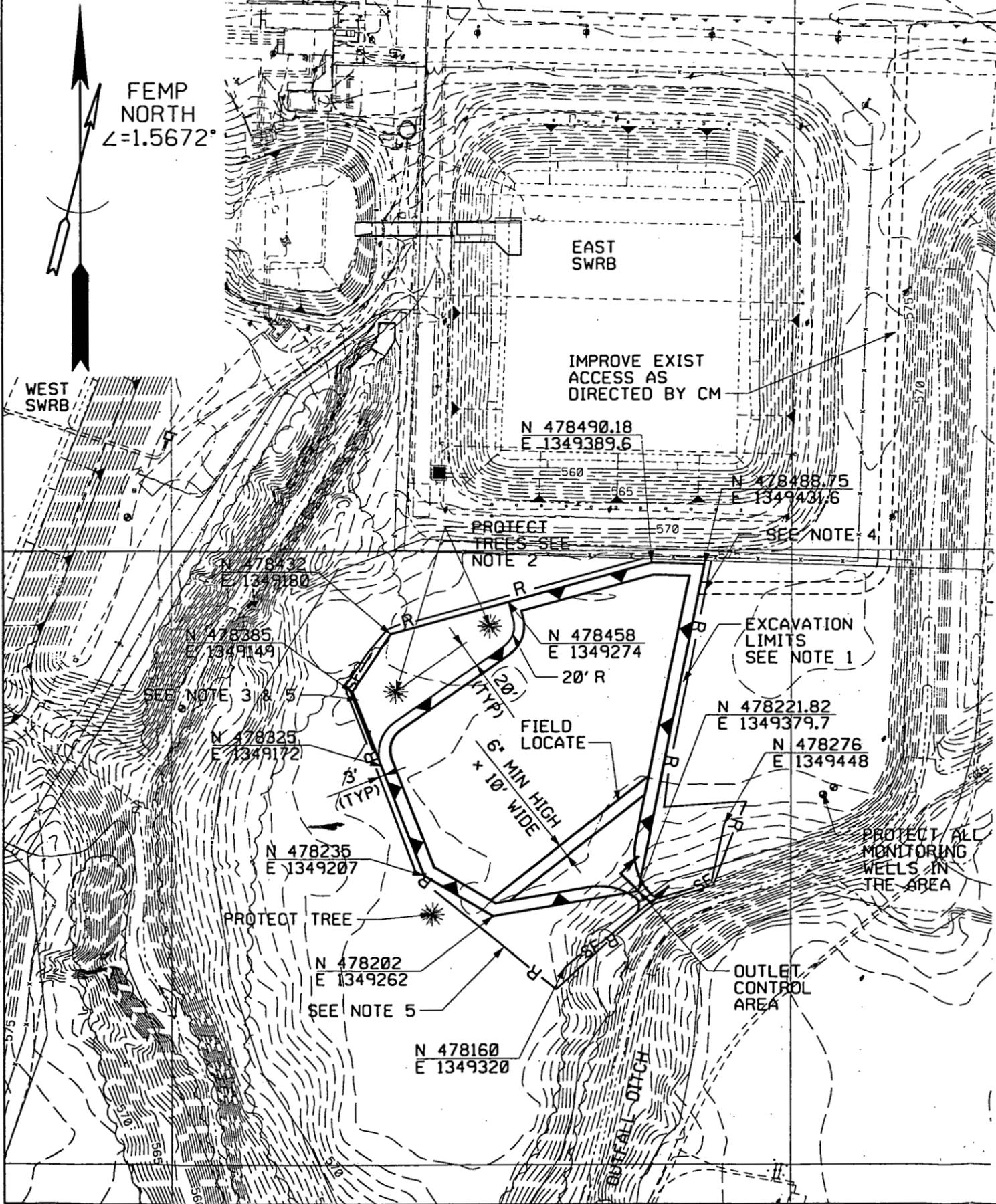
AREA 2 PHASE III PART 2

TRAFFIC PLAN
 DCN 20402-102
 DCN090396.DGN
 SKETCH 1 OF 2
 SCALE 1"=600'

NON-IMPACTED MATERIAL STOCKPILE #2

PADDY'S RUN

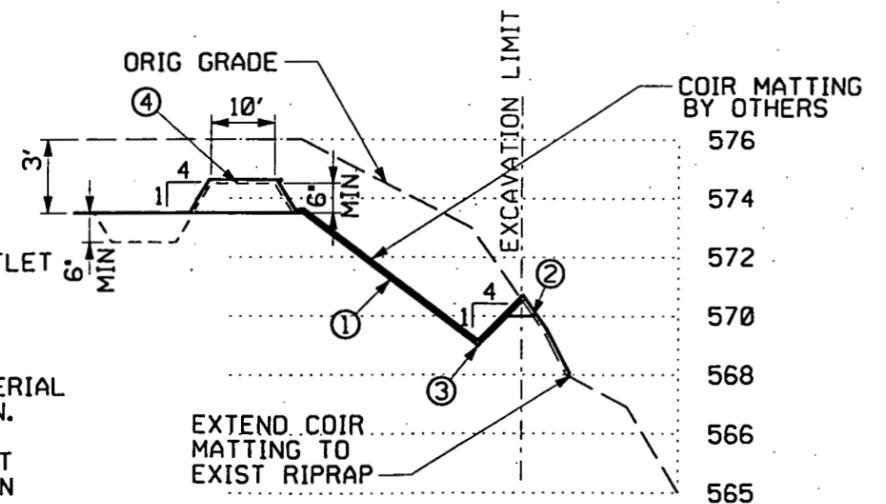
SOUTH ACCESS ROAD



NOTES:

1. EXCAVATE 3' DEPTH AT 4H:1V STARTING FROM THE EXCAVATION LIMITS SHOWN, EXCEPT FOR THE AREA IDENTIFIED IN NOTE 2.
2. STRIP SOIL WITH HAND TOOLS WITHIN 10' OF TREE TRUNK. STRIP ONLY 6" DEPTH WITHIN AREA SHOWN TO PROTECT TREES OR AS DIRECTED BY THE CM. PROVIDE POSITIVE DRAINAGE AFTER STRIPPING.
3. INSTALL SILT FENCE AS SHOWN UNLESS DIRECTED BY THE CM.
4. FIELD LOCATE BUFFER AREA TO ALLOW FOR CLEAN LOADING SUBJECT TO CM APPROVAL.
5. FIELD LOCATE CONSTRUCTION FENCE AROUND AREA AND APPROXIMATELY 3' OUTSIDE OF SILT FENCE. CONSTRUCTION FENCE SHALL BE T-POST (60' C/C) AND ROPE CONSTRUCTION WITH ROPE GATE.
6. FDF SHALL PROVIDE CONTAMINATION AREA SIGNS FOR THE CONTRACTOR TO INSTALL. THE CONTRACTOR SHALL FURNISH AND INSTALL CONSTRUCTION AREA SIGNS.
7. SUBMIT PROPOSED SEQUENCE OF CONSTRUCTION IN WRITING TO THE CM FOR APPROVAL PRIOR TO INITIATING WORK.
8. TOLERANCE OF 6 INCHES DEEPER ADDITIONAL EXCAVATION IS ACCEPTABLE UNLESS OTHERWISE DIRECTED BY THE CM.
9. CONTRACTOR SHALL EXCAVATE MATERIAL SUCH THAT IT CAN BE CLASSIFIED AS CATEGORY 1 MATERIAL FOR OSDF PLACEMENT.
10. FDF SHALL PERFORM ALL FINAL STABILIZATION TO INCLUDE SEEDING AND COIR MATTING.
11. SURVEYOR TO STAKE OUT AND PROVIDE FIELD RUN PRELIMINARY TOPOGRAPHIC SURVEY OF THE EXISTING CONDITIONS OF THE WORK AREA. SUBMIT TO THE CONSTRUCTION MANAGER WITHIN 7 DAYS OF THE SURVEY. SURVEYOR TO RESTAKE OUT EXCAVATION LIMITS AND PROVIDE FINAL FIELD RUN TOPOGRAPHIC SURVEY. SUBMIT THE SURVEY TO THE CONSTRUCTION MANAGER WITHIN 7 DAYS OF THE SURVEY.
12. UPON DIRECTION FROM THE CONSTRUCTION MANAGER, INSTALL OUTLET CONTROL AND SECOND BERM WHICH SHALL BE FIELD LOCATED.

- ① INITIAL EXCAVATION 3'.
- ② OUTLET CONTROL @ 0% SLOPE, 10' WIDE AND 10' LONG (MIN) COIR MATTING BY OTHERS @ OUTLET 6' MIN
- ③ FINAL DEPTH BELOW OUTLET CONTROL 6" MIN, 18" MAX
- ④ CONSTRUCT 2ND BERM FROM MATERIAL DEEPER THAN INITIAL EXCAVATION. COMPACT BY 4 PASSES (MIN) OF CONSTRUCTION EQUIPMENT. LOWEST AREA OF BERM TOP TO BE 10' MIN LEVEL AREA.



SECTION @ OUTLET CONTROL
NTS

SITE PLAN
DCN 20402-102
DCN090397.DGN
SKETCH 2 OF 2
SCALE 1"=100'