



State of Ohio Environmental Protection Agency

**Southwest District Office**

401 East Fifth Street  
Dayton, Ohio 45402-2911  
(513) 285-6357  
FAX (513) 285-6249

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George V. Voinovich  
Governor

March 8, 2000

Mr. Johnny Reising  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

**RE: APPROVAL RTC ON ADDENDA 2, 3, AND 4 IMPP AND ASBESTOS DISPOSAL**

Dear Mr. Reising:

This letter provides Ohio Environmental Protection Agency approval of the Responses to Comments for draft Addenda 2, 3, and 4 of the Impacted Materials Placement Plan for the On-Site Disposal Facility. We also approve the request that Addendum 2 be extended to include non-bagged, broken transite debris. For that reason, Addendum 4 will no longer be used. We would like to take this opportunity to summarize all of the categories and disposal methods for transite and asbestos containing material.

1. Bagged ACM placed in 2 to 3 foot-wide trenches as highly compressible Category 5 material per Section 8.6.3 of the IMPP.
2. Piping wrapped with asbestos placed in excavations per Section 8.6.4 of the IMPP.
3. Transite panels bundled and wrapped and placed individually per Section 8.4 of the IMPP
4. Bagged ACM placed in trenches per Addendum 1 of the IMPP. These trenches may be wider than in method 1 to accommodate larger bags of ACM.
5. Non-bagged broken transite (and thorium) debris and/or friable asbestos mixtures to be placed by grid or trench per Addendum 2 to the IEMP.

One of the placement methods proposed in DCN No. 20402-103 and to be used for materials excavated from the SWU this year is item number 5.

The following summarizes and the methods to be used to control fugitive emissions and to protect workers from potential exposure to asbestos fibers:

Excavated soil/ACM mixtures will be placed into a roll-off box lined with a 12-mil

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plastic liner. The ROB will be unloaded into a prepared trench at the OSDF. A track hoe will be utilized if necessary to adjust the debris depth. An Exclusion Zone will be established at the unloading area and no foot traffic will be allowed until the area has been cleared by the Asbestos Competent Person. Lifts of Category 1 material will be placed and compacted over the soil/ACM mixture as per Addendum 2. Water sprays will be employed at both the SWU and OSDF and the performance criterion for fugitive dust control is that there be no visible emissions. Breathing Zone and General Area air monitors will be used at both locations to evaluate the adequacy of controls.

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

Sincerely,



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

cc: Jim Saric, U.S. EPA  
Terry Hagen, FDF  
Mark Shupe, HSI GeoTrans  
Francie Hodge, Tetra Tech EM Inc.  
Ruth Vandergrift, ODH