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PRELIMINARY DESIGN PACKAGE FOR HAUL ROAD

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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FILE:
LIBRARY REPLY TO THE ATTENTION OF:
SRF-5J

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

RE: Preliminary Design
Package for Haul Road

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) preliminary design package (30 percent) for the haul road and rerouted north entrance road. The design package provides the proposed design for the on-site disposal facility haul road and the rerouted north entrance road.

Although the design package conforms to the Operable Unit 2 Record of Decision and generally accepted engineering practices, U.S. EPA has several comments.

Therefore, U.S. EPA hereby disapproves the preliminary design package pending incorporation of adequate responses to comments (RTC) to the attached comments. U.S. DOE must submit a RTC document within thirty (30) days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Jack Baublitz, U.S. DOE-HDQ
John Bradburne, FERMCO
Charles Little, FERMCO
Terry Hagen, FERMCO
Michael Yates, FERMCO

**TECHNICAL REVIEW COMMENTS ON THE PRELIMINARY DESIGN
PACKAGE (30 PERCENT)
FOR THE HAUL ROAD AND REROUTED NORTH ENTRANCE ROAD
FERNALD ENVIRONMENTAL MANAGEMENT PROJECT, FERNALD, OHIO**

SPECIFIC COMMENTS

DESIGN CRITERIA PACKAGE (DCP)

Commenting Organization: U.S. EPA
Section #: 1.4
Original Specific Comment #: 1

Commentor: Saric
Line#: NA

Page #: 1-5

Comment: Item No. 11 in this section states that an operable unit 5 (OU5) construction contractor will remove contaminated soil until remaining soil meets final remediation level (FRL) requirements before North Entrance Road area construction begins. The text further states that Parsons will recommend locations for stockpiling contaminated soil and that disposal of the contaminated soil is beyond the scope of work for this project.

It is not sufficient to only state that an OU5 construction contractor will remove contaminated soil and that Parson's will recommend the stockpiling locations for contaminated soil. Approved OU5 and Removal Action 17 (RvA17) documents are available that outline procedures for soil removal and stockpiling activities. The text should be revised to state that contaminated soil removal activities to facilitate construction of the north entrance road will be completed under the provisions outlined in the final OU5 Record of Decision (ROD) dated January 1996. Any soil requiring removal will be managed under the provisions of the RvA 17 Work Plan, Revision 3. The DCP should also provide a schedule of contaminated soil removal activities in relation to the activities associated with the construction of the north entrance road.

Commenting Organization: U.S. EPA
Section #: 2.1.1
Original Specific Comment #: 2

Commentor: Saric
Line#: NA

Page #: 2-1

Comment: The text states that the "use of rock for base will be avoided to minimize contaminated rocks to be disposed of at the OSDF." The term "rock" should be defined. It is unclear whether this term includes the 3-inch diameter aggregate material proposed for use as subgrade or if it only refers to materials larger than the 3-inch diameter aggregate. Also, the use of "rock" is proposed in the construction specifications and is shown to be used in the

haul road design. This statement should be revised to state that the use of "rock" will be "minimized" instead of "avoided."

Commenting Organization: U.S. EPA
Section #: 2.3.1 Page #: 2-11
Original Specific Comment #: 3

Commentor: Saric
Line#: NA

Comment: The text states that the haul road will consist of full depth bituminous pavement and that an aggregate base will not be used. The calculations and the drawings indicate that the top layer consists of 10.5 inches of asphalt concrete and that the layer below consists of a 3-inch thick aggregate base. This discrepancy should be resolved so that the text is consistent with all calculations and drawings.

Commenting Organization: U.S. EPA
Section #: 2.3.1 Page #: 2-11
Original Specific Comment #: 4

Commentor: Saric
Line#: NA

Comment: The excavation and disposal of contaminated materials section states that FERMO or the "construction contractor," as appropriate, will (1) remove contaminated soil so that remaining soil meets FRLs and (2) stockpile the soil at a designated on-site area. The term "construction contractor" should be clarified. It is not clear whether the "OU5 construction contractor" referred to in Section 1.4, Page 1-4, of this document is referred to here or whether the haul road and north entrance road contractor is referred to. In addition, the text should be revised to state that contaminated soil removal will be completed under the provisions outlined in the final OU5 ROD dated January 1996 and that any soil removed will be managed under the provisions of RvA 17 Work Plan, Revision 3.

Commenting Organization: U.S. EPA
Section #: 2.3.5 Page #: 2-16
Original Specific Comment #: 5

Commentor: Saric
Line#: NA

Comment: The haul road soil remediation section states that the haul road is considered a temporary unit under the Resource Conservation and Recovery Act (RCRA) Corrective Action Management Unit (CAMU) rule because it will be located in a contaminated area and because it is to be removed after construction of the on-site disposal facility (OSDF). The text states that cleanup guidelines established in the RvA 17 Work Plan will apply. The text should be revised to also state that cleanup guidelines and procedures established in the final OU5 ROD dated January 1996 will also apply, and the reference to the RvA 17 Work Plan should be revised to specify that the RvA 17 Work Plan is Revision 3.

Commenting Organization: U.S. EPA
 Section #: 2.3.5 Page #: 2-16
 Original Specific Comment #: 6

Commentor: Saric
 Line#: NA

Comment: The haul road soil remediation section states that parts of the haul road will be located in a contaminated area and will be considered temporary in accordance with the "Fernald Environmental Management Project (FEMP) build-over policy." This approach is acceptable under the RCRA CAMU temporary unit rule (Title 40 Code of Federal Regulations [CFR] 264.553); however, the reference to the "FEMP build-over policy" is outdated and incomplete. This reference should be revised to reference the provisions of the backfill policy in Section 2.5 of the RvA 17 Work Plan, Revision 3.

Commenting Organization: U.S. EPA
 Section #: 2.3.5 Page #: 2-17
 Original Specific Comment #: 7

Commentor: Saric
 Line#: NA

Comment: The north entrance road soil remediation section states that the FRLs from the draft ROD for remedial actions at OU5 provided in Table 2-5 will apply. The text should be revised to state that the FRLs from the final ROD for remedial actions at OU5 dated January 1996 provided in Table 9-3 will apply.

PRELIMINARY DESIGN DRAWING PACKAGE

Haul Road Construction

Commenting Organization: U.S. EPA
 Drawing#: G-00184 Page #: NA
 Original Specific Comment #: 8

Commentor: Saric
 Line#: NA

Comment: This sheet presents typical pavement cross sections of the haul road and indicates each layer of pavement and its thickness. A legend indicating the type of material and the thickness of each layer is also shown and is cross-referenced with a numbered balloon to the cross sections. Balloon 4 indicates an aggregate shoulder but does not indicate the aggregate thickness. This thickness should be indicated in the legend.

Commenting Organization: U.S. EPA
 Drawing #: G-00185 to G-00190 Page #: NA
 Original Specific Comment #: 9

Commentor: Saric
 Line#: NA

Comment: Existing ground contour maps of FEMP in the areas of the haul road are provided and are used as the basis of the design for the proposed profile sheets and cross sections of the new road. The contour maps have a 5-foot contour interval. With a 5-foot contour interval, the accuracy of the ground contours are only as accurate as one-half of the contour interval (± 2.5 feet). The proposed profile sheets indicate an accuracy of 0.001 foot. When a new, more

