

**Department of Energy****Ohio Field Office
Fernald Area Office**P. O. Box 538705
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(513) 648-3155JUN 27 1997
DOE-1133-97**Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 E. Fifth Street
Dayton, OH 45402-2911**

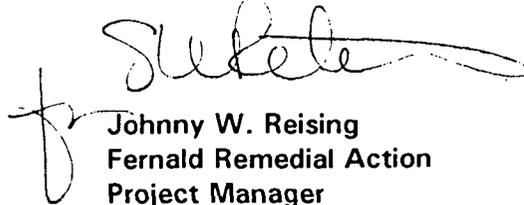
Dear Mr. Schneider:

**BEST AVAILABLE TECHNOLOGY DETERMINATION FOR REMEDIAL CONSTRUCTION
ACTIVITIES ON THE FERNALD ENVIRONMENTAL MANAGEMENT PROJECT**Reference: Letter, T. Schneider to J. Reising, "Fugitive Dust Control", dated May 30,
1997.

Please find enclosed a table that represents the stand-alone policy for fugitive dust control that will be included as appropriate by reference into the operating plans for the individual remediation projects. This incorporates those changes made as a result of comments received from the Ohio Environmental Protection Agency (OEPA). The final fugitive dust control plan will be implemented before construction of the On-Site Disposal Facility (OSDF).

If you have any questions concerning this matter, please contact Kathi Nickel at (513) 648-3166.

Sincerely,


Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Nickel

Enclosure: As Stated

cc w/o enc:

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L. Goidell, FDF, 65-2
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Category	Remediation Activities/Areas Included	Standard or Site-Specific Limit	Dust Controls/Work Practices *
Project field activities and material handling/vehicle traffic on storage piles	Activities: <ul style="list-style-type: none"> • Excavation • Trenching • Loading/Unloading • Transportation to defined roadway (paved or unpaved) • Load-in/Load-out on storage piles • Material placement in Onsite Disposal Cell • Vehicle traffic on storage piles Areas: <ul style="list-style-type: none"> • Working faces • Transition areas between working faces and defined roadways (paved or unpaved) • Onsite Disposal Cell • Storage piles 	Standard: Visible particulate emissions from project field activities/areas shall not exceed twenty percent (20%) opacity as a three minute average. (OAC 3745-17-07 (B)(1))	<ul style="list-style-type: none"> • Apply dust suppression agents. • Minimize the amount of unnecessary traffic in and around field activities. • Limit speed to 15 mph or less during operation of equipment or vehicles. • Reduce rate of excavation. • Minimize height of drop during loading and unloading. • Change method of excavation & transport (E.G., from front-end loader dumping into a truck to a self-propelled pan). • Apply dust suppression agents such as surfactants or crusting agents to storage piles. • Apply appropriate dust suppression agents such as water or surfactants to materials being transported by truck load beds to ensure the transported materials will not become airborne; cover truck load beds when transported materials are still likely to become airborne.

* to be applied progressively as environmental conditions dictate.

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Category	Remediation Activities/Areas Included	Standard or Site-Specific Limit	Dust Controls/Work Practices *
Paved roadways and paved parking areas	<p>Activities:</p> <ul style="list-style-type: none"> • Hauling materials and equipment • Vehicle and equipment traffic <p>Areas:</p> <p>All predetermined areas designed and improved specifically for vehicle traffic. Improvements include the application of materials such as asphalt or concrete that forms a firm level surface for travel.</p>	<p>Limit:</p> <p>There shall be no visible particulate emissions from any paved roadway or paved parking area except for a period of time not to exceed one minute during any sixty-minute observation period.</p>	<ul style="list-style-type: none"> • Apply dust suppression agents. • Minimize the amount of unnecessary traffic on paved roadways used for hauling materials and vehicle/equipment traffic. • Limit speed to 15 mph or less during operation of equipment or vehicles. • Apply appropriate dust suppression agents such as water or surfactants to materials being transported by truck load beds to ensure the transported materials will not become airborne; cover truck load beds when transported materials are still likely to become airborne. • Wheel wash prior to entering paved roadways or paved parking areas. • Wet sweep or otherwise remove any clods, clumps, tracks, or visible deposits of soil or mud from paved roadways or paved parking areas, applying appropriate dust control measures to suppress the generation of visible dust that may result from the sweeping or removal process. • Repair or resurface paved roadways/parking areas as needed.
Unpaved roadways, unpaved parking areas, and wind erosion from storage piles	<p>Activities:</p> <ul style="list-style-type: none"> • Hauling materials and equipment • Vehicle and equipment traffic <p>Areas:</p> <p>All predetermined areas designed and improved specifically for vehicle traffic. Improvements include the application of gravel, shredded shingles, cinders, compaction, etc. to the delineated areas</p>	<p>Limit:</p> <p>There shall be no visible particulate emissions from any unpaved roadway, unpaved parking area, or wind erosion from a storage pile except for a period of time not to exceed three minutes during any sixty-minute observation period.</p>	<ul style="list-style-type: none"> • Apply dust suppression agents. • Minimize the amount of unnecessary traffic on unpaved roadways or unpaved parking areas. • Limit speed to 15 mph during operation of equipment or vehicles • Apply dust suppression agents such as surfactants or crusting agents to storage piles or cover with tarpaulin, plastic etc., if practical; for extended periods of planned inactivity, vegetate as a last resort if protective cover or periodic application of crusting agent proves ineffective. • Apply appropriate dust suppression agents such as water or surfactants to materials being transported by truck load beds to ensure the transported materials will not become airborne; cover truck load beds when transported materials are still likely to become airborne. • Wheel wash prior to entering unpaved roadways or unpaved parking areas. • Remove, as practical, any clods, clumps, tracks, or visible deposits of soil or mud from unpaved roadways or unpaved parking areas. • Repair or resurface roadways/parking areas as needed or use an alternative road surface as a last resort.

4

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