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March 18, 1998

RE: DOE FEMP
COMMENTS
OSDF CQA REPORT

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

Dear Mr. Reising:

This letter provides Ohio Environmental Protection Agency comments on the Construction Quality Assurance Final Report for the On-Site Disposal Facility, Phase 1 and the Leachate Conveyance System. This Report was transmitted as an attachment to DOE letter-0384-98 and is not an approvable document in the Operable Unit 2 Remedial Action Work Plan. We provide these comments in the interest of continuing the high level of quality that has been an important part of the OSDF Project.

1) Commenting Organization: OEPA Commentor: HSI GeoTrans
Section#: 4.5.3 Pg.#: 33 Line #:17 Code: C
Comment: The text indicates that two of the density tests failed and the soil in these instances was not recompacted. The Report is not adequate in describing whether these failures are significant. The Nuclear Moisture/Density Test Log (sheet 1 of 5, dated 30 Sept. 1997) in Appendix G indicates that the Test 625 passed but the associated APZ graph (page 4 of 5 same date) shows that Test 625 appears to have marginally failed. Test 625 is marked in the margin with a double asterisk (**), but this did not appear to refer to anything else on the page.
Test 515 appears to have failed the criteria in the APZ chart (page 5 of 6, dated 23 Sept 1997) but the Test Log (page 1 of 6, same date) shows this test has been marked as passing.

While two uncorrected failures in a liner of this size may not be significant, the text does not indicate how these failed test were overlooked, how significant the failures were, possible checks to reduce the possibility of recurrence or bench-mark this level of performance with industry standards.

2) Commenting Organization: OEPA Commentor: HSI GeoTrans
Section#: 4 Pg.#: Tables 4-3 and 4 Line #: Code: C
Comment: According to Tables 4-3 and 4-4, a total of 8 samples of the granular drainage

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material failed to meet the specifications. However, this is not mentioned in the text of sections 4.5.4 and 4.5.5. What was done with the rejected materials?

3) Commenting Organization: OEPA Commentor: HSI GeoTrans
Section#: 5 Pg.#: Table 5-1 Line #: Code: C
Comment: Table 5-1 indicates that there were 4 lots of geosynthetic clay liner which failed the QC testing but passed the QA testing. There is no explanation of this discrepancy in the text on page 43. This may have been related to the shear testing that was the subject of a memo last fall, but that is not mentioned.

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, FDF
Ruth Vandergrift, ODH
Mark Shupe, HSI- GeoTrans, Inc.
Francie Barker, Tetra Tech EM Inc.
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