



State of Ohio Environmental Protection Agency

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LOG # 202280

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George V. Voinovich
Governor

September 18, 1998

RE: DOE FEMP
COMMENTS: SILOS
INFRASTRUCTURE PROJECT
DESIGN PACKAGE

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

Dear Mr. Reising:

Ohio EPA has reviewed DOE's August 20, 1998 submittal, "Silos Project Infrastructure Document." Attached are Ohio EPA's comments on the document.

If you have any questions, please contact 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
Francie Barker, Tetra Tech EM Inc.
Manager, TPSS/DERR,CO

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Silos Infrastructure Document Submittal

1716

Scope of Work

1. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:
Comment: The scope of work does not include the monitoring well abandonment. There is some confusion on the reviewers part regarding how the monitoring well abandonment fits into the project and if the proposed well activities were presented in a previous submittal to the agencies. Clarification would be appreciated.

2. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:
Comment: Ohio EPA does not agree with the proposed road design along the pilot plant drainage ditch as shown on the drawings. DOE should have evaluated roadway alternatives that limited the amount of fill activity required within the stream corridor. Ohio EPA believes DOE should re-evaluate the road design to limit the need for fill within the stream.

3. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:
Comment: Considering the design proposes to place fill within the stream, the document should detail how the Army Corps of Engineers will be involved in permitting the project.

4. Commenting Organization: OEPA Commentor: OFFO
Section #: Exhibit 6.1(9.2) Pg. #: Line #: Code: C
Original Comment #:
Comment: The WAC Plan includes no provisions for temporary stockpiling above WAC material. The project should be revised to immediately transport any excavated above WAC material to SP-7.

Waste Management Requirements

5. Commenting Organization: OEPA Commentor: OFFO
Section #: Item 2., Second Paragraph Pg. #: 3 of 4 Line #: Code: C
Original Comment #:
Comment: Second sentence of the second paragraph states that the *excess soil generated* will be placed *in the field south of the K-65 trench*. However, the figure, #94X-5500-X-XK-1035, does not display the stockpile area. Additionally, Ohio EPA believes that any excess soil should go directly to the OSDF, assuming placement operations are on-going, rather than generate additional stockpiles.

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6. Commenting Organization: OEPA Commentor: OFFO
 Section #: Item 4, Option 2 Pg. #: 4 of 4 Line #: Code: C
 Original Comment #:

Comment: Option 2 explains that soils exceeding the OSDF WAC Attainment Plan will be staged in a *temporary working stockpile*. However in the WAC Plan, there are no allowances for staging soil above the WAC. Above WAC soils should be transferred directly to SP-7

Technical Specifications

7. Commenting Organization: OEPA Commentor: OFFO
 Section #: Pg. #: Line #: Code: C
 Original Comment #:

Comment: The specifications are not consistent in their reference to the State of Ohio DOT Construction and Material Specification. Several reference the 1/95 while some reference the newer 1/97 version. Revise the specifications to refer to the 1997 version.

8. Commenting Organization: OEPA Commentor: OFFO
 Section #: 02110/3.2 (C)Item 3 Pg. #:2 of 3 Line #: Code: C
 Original Comment #:

Comment: Item 3 states that *soil material from other excavations may be used*. However, it does not differentiate between using the excavation soils within this project or any project on-site. Please clarify to limit to material from this project only.

9. Commenting Organization: OEPA Commentor: OFFO
 Section #:02110/3.2 (D) Item 2. Pg. #: 2 of 3 Line #: Code: C
 Original Comment #:

Comment: Item 2 states that the excavated soil will be stockpiled. Where will it be placed? Additionally, Ohio EPA believes that the excess soil should go to the OSDF.

10. Commenting Organization: OEPA Commentor: OFFO
 Section #:Spec. 02200(2.1)E Pg. #: 3 Line #: Code: C
 Original Comment #:

Comment: No definition of slag is provided. Additional detail on type of proposed slag should be provided or preferably reference to slag deleted.

11. Commenting Organization: OEPA Commentor: OFFO
 Section #:Spec. 02200(3.1)F(5) Pg. #: 4 Line #: Code: C
 Original Comment #:

Comment: Bullet 5 refers to constructing the temporary storm water basin first. No temporary

sediment basin is evident in the drawings provided. Additional detail should be provided.

12. Commenting Organization: OEPA Commentor: OFFO
 Section #:Spec. 02200(3.1)G(1) Pg. #: Line #: Code: C
 Original Comment #:
 Comment: This bullet appears to contain a typo. Please revise the sentence.

13. Commenting Organization: OEPA Commentor: OFFO
 Section #:02220(3.5)F Pg. #: 6 Line #: Code: C
 Original Comment #:
 Comment: Revise the text to require silt fence around the catch basins rather than straw/hay bales. The use of silt fence is consistent with specification 02270.

14. Commenting Organization: OEPA Commentor: OFFO
 Section #:02270(2.1)E Pg. #: 4 Line #: Code: C
 Original Comment #:
 Comment: Ohio EPA recommends use of biodegradable erosion blankets. Previous uses of UV stabilized netting at Fernald have had significant drawbacks including lifting by growing grass, entrapment of birds, and failure to decompose after long periods of time. Ohio EPA recommends use of a coconut mesh similar to that used on the recent Paddys Run stabilization effort (Fiber-Blanket, FB80). Also see Specification 02270 in the A1PII CFC Site Prep. Package.

15. Commenting Organization: OEPA Commentor: OFFO
 Section #:02270(3.1)A(3) Pg. #: 4 Line #: Code: C
 Original Comment #:
 Comment: Stabilization of piles that are planned to be left idle for more than 45 days must be stabilized as soon as possible but no longer than 7 days after the last activity. The text as written suggests the contractor can wait 45 days after the last activity before stabilizing.

16. Commenting Organization: OEPA Commentor: OFFO
 Section #:02270(3.1)A(3) Pg. #: 4 Line #: Code: C
 Original Comment #:
 Comment: The text states the soil piles may reach 15 feet in height whereas previous text states that piles may be no higher than 8 feet. Review the document for consistency.

17. Commenting Organization: OEPA Commentor: OFFO
 Section #:02270(3.1)B Pg. #: 5 Line #: Code: C
 Original Comment #:
 Comment: Please include a bullet stating that points where two separate sections of silt fence

connect, require wrapping of the two end pieces around each other to prevent separation.

18. Commenting Organization: OEPA Commentor: OFFO
Section #:02900(3.1)E Pg. #: 6 Line #: Code: C
Original Comment #:
Comment: This paragraph references the STP excavation. Please clarify.

Drawings

19. Commenting Organization: OEPA Commentor: OFFO
Section #:General Pg. #: Line #: Code: C
Original Comment #:
Comment: For future revisions please provide drawings bound/stapled together and in order. Additionally, the drawing index should be revised to include all drawings within the package.

20. Commenting Organization: OEPA Commentor: OFFO
Section #:94X-6100-G-02209 Pg. #: Line #: Code: C
Original Comment #:
Comment: This figures shows both filling and excavation within a basin in the northern portion drawing. The specifications do not address this activity. Additional details and calculations should be provided regarding this cut and fill operation.

21. Commenting Organization: OEPA Commentor: OFFO
Section #:94X-6100-G-02221 Pg. #: Line #: Code: C
Original Comment #:
Comment: Include detail figure on wrapped connections for silt fence. See Rainwater and Land Development page 120.

22. Commenting Organization: OEPA Commentor: OFFO
Section #:94X-6100-G-02221 Pg. #: Line #: Code: C
Original Comment #:
Comment: Silt fence should be located consistent with Specification 02270 and Rainwater and Land Development (see page 118; i.e., following the contour). As shown on the drawing silt fence is located inconsistent with the specification. Additionally the figure should note locations of any check dams or erosion matting.

23. Commenting Organization: OEPA Commentor: OFFO
Section #:94X-6100-G-02221 Pg. #: Line #: Code: C
Original Comment #:
Comment: The figure should be revised to include surface water flow arrows.

