



State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

January 4, 1998

RE: DOE FEMP  
COMMENTS: FIRST LOADOUT WP FOR  
WPRAP

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 December 23, 1998 submittal, "Transmittal of Remedial Action Work Plan for First Loadout Activities, WPRAP, OU1." Attached are Ohio EPA comments on the document. Following submittal of acceptable responses to the comments Ohio EPA will approve the work plan.

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  
Francie Barker, Tetra Tech EM Inc.  
Manager, TPSS/DERR,CO

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**Ohio EPA Comments on  
OU1 First Loadout Plan**

1. Commenting Organization: OEPA Commentor: OFFO  
Section #:3.1 Pg. #: 11 Line #: 33-35 Code: C

Original Comment #:

Comment: The term "original grade" is used but undefined other than a map. The map then shows piles as part of the "original grade." Ohio EPA believes the SP6 should be removed to an extent that would remove the piles shown on Figure 3-1. Additionally, due to the uncontrolled stormwater runoff from the area, a final grade that would direct water to a low point within the former footprint thus allowing settling prior to evaporation or runoff is necessary. In particular stormwater from the area around the hopper which will continue to be used for SP7 transfer should drain to a ponding area.

2. Commenting Organization: OEPA Commentor: OFFO  
Section #:3.1 Pg. #: 13 Line #: 8-9 Code: C

Original Comment #:

Comment: Ohio EPA has concerns with the use of an end loader for transfer of materials from SP7 to the hopper. The potential for spillage and fugitive dust would seem to be substantially greater than from a truck. The document should be revised to remove reference to the use of end loaders for transport or to provide additional detail on the controls which will be used to address these concerns.

3. Commenting Organization: OEPA Commentor: OFFO  
Section #:3.1 Pg. #:13 Line #: Code: C

Original Comment #:

Comment: The document discusses the screening of items larger than 3" but does not address management of the reject material. The document should include detail on management of this waste. Ohio EPA recommends incorporation of a strategy for transfer of the material to railcars at a rate not to exceed Envirocare's debris criteria during first loadout.

4. Commenting Organization: OEPA Commentor: OFFO  
Section #:4.1.1 Pg. #: 21 Line #: 32-36 Code: C

Original Comment #:

Comment: The document references seeding of disturbed areas. Ohio EPA recommends DOE incorporate specific language from the Soils project specification 02900. The existing language must be revised regarding the timing of stabilization (i.e., within 7 days of knowing the pile/area will be idle for 45 days stabilization must occur). Additionally, the seed mixture is dependent upon the duration before additional disturbance (e.g., temporary seeding vs. permanent).

5. Commenting Organization: OEPA Commentor: OFFO  
Section #:4.1.2 Pg. #: 22 Line #: 33-35 Code: C

Original Comment #:

Comment: See previous comment regarding time requirements for stabilization of disturbed

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soils.

6. Commenting Organization: OEPA Commentor: OFFO  
Section #:4.1.3 Pg. #: 23 Line #: 15-20 Code: C  
Original Comment #:

Comment: Once construction is complete and vegetative cover established the silt fence could be removed.

7. Commenting Organization: OEPA Commentor: OFFO  
Section #:4.2.1 Pg. #: 24 Line #: 10 Code: C  
Original Comment #:

Comment: Asphaltic based crusting agents should be added to the "do not use" list.