



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

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George V. Voinovich
Governor

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January 7, 1999

RE: DOE FEMP
COMMENTS
CHANGE PAGES TO
IMPP

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 as an attachment Ohio Environmental Protection Agency comments on the "Proposed Change Pages to the Impacted Material Placement Plan for the On-Site Disposal Facility."

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 Hodge, Tetra Tech EM Inc.
Manager, TPSS/DERR,CO

1

**Ohio Environmental Protection Agency comments on the Proposed Change Pages to the
Impacted Material Placement Plan for the On-Site Disposal Facility
dated December 7, 1998**

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Comment Pg #: Line #: Code: M
Comment: Ohio EPA believes it is necessary to have DOE/FDF present a plan for optimization of placement activities prior to our approval of any stockpiling activities within the OSDF. The current winter shutdown provides an opportune time for completing an optimization plan and strategizing for the upcoming field season. It is Ohio EPA's expectation that DOE & FDF will take full advantage of this time for such planning.
- 2) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.2 Pg #: 5.1 Line #: 28-30 Code: c
Comment: The Ohio EPA agrees that flexibility in the lift height of Category 2 materials is warranted. Our intent is to approve this criteria (lift height of 21 inches plus or minus three inches) only to allow for structural steel and other D&D debris that protrudes above 21 inches as explained in the text on page 8-1. It is not our intent to approve placing of soil-like Category 1 materials in lifts greater than 21 inches.
The text later in this paragraph refers to materials that are moderately compactible under Caterpillar D-8 bulldozer or a Caterpillar 815C compactor. Experience this construction year has demonstrated that satisfactory compaction of D&D debris is best achieved by using a Caterpillar 826 compactor. Our approval of the modified lift height criterion is contingent on using only the Caterpillar 826 to compact Category 2 D&D debris.
- 3) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 6.9 Pg #: 6-5 Line #: bullet 1, line 40 Code: c
Comment: A clarifying phrase should be added to this bullet that makes it clear that it is only Category 2 D&D debris that is exempted from daily cover. It is not Ohio EPA's intent to exclude soil-like Category 2 material from the daily cover requirement and the erosion/fugitive dust controls committed to in the paragraph beginning on line 30 of this page.
The change of the time interval for cover (from daily to fifteen working days to cover) is not warranted based on past performance. We believe that a five working day requirement is adequate.
- 4) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 6.9 Pg #: 6-6 Line #: bullet 3 Code: c
Comment: During this construction year it became obvious that it was not possible to consistently place and cover an entire grid of transite panels in one working day and in some circumstances it was not always possible to achieve cover in two days. We believe that a five working day requirement as long as continual progress is being made should be adequate in all circumstances to achieve cover.

- 5) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 6.9 Pg #: 6-6 Line #: item 3 Code: c
Comment: A commitment to apply additional lock-down agent if a daily inspection reveals exposed friable asbestos should be added to this item.
- 6) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 6.9 Pg #: 6-6 Line #: item 4 Code: c
Comment: Replace the approximately 6 inch cover of Category 1 with a one foot cover of Category 1. The original plan required a one foot cover over Category 4 materials and we question the ability to reliably place lifts as thin as six inches of soil over highly compressible materials. In either case, due to its propensity to be transported by the wind, Category 4 material is not a good candidate for minimal cover.
- 7) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 6.10 Pg #: 6-6 Line #: 27 Code: c
Comment: Add to this paragraph a limit of one grid and a height restriction of five feet. Also add a commitment for erosion and fugitive dust control.
The wording of the sentence should be modified to state that only materials for road construction may be staged (e.g., gravel, concrete, rock and similar aggregate materials) other Category 2 materials may not be staged.
- 8) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: 4-3 Line #: 33 Code: c
Comment: A distinction should be made between surface water drainage conduit that is in service and pipes that are dug up from fill areas (that is, pipes that are not in service when they are excavated but have been previously disposed of). Pipes that have been disposed of are very likely packed full of dirt and will not be able to be visually verified that they are free from process residues. This is especially important for vitrified clay pipes which may be process related or surface water drainage conduit.
- 9) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 8.3.2 Pg #: 8-2 Line #: 27 Code: c
Comment: The rut depth specification (three inches plus or minus one inch) in the change pages is not consistent with a 90% Proctor density. If two inch deep rut in a lift of Category 2 material with a Category 1 cover is compacted to a 95% Proctor, we maintain that a lift compacted to the extent it yields a four-inch rut is compacted to less than 90% Proctor. Our reasoning is as follows:
Given: Soil compacted to the extent that it yields under tire pressure to give a two inch deep rut is compacted to 95% Proctor.

