



State of Ohio Environmental Protection Agency

**Southwest District Office**

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George V. Voinovich  
Governor

FILE:  
LIB:  
RE: DOE FEMP

January 21, 1999

COMMENTS: AIPII IRDP  
SUPPLEMENTAL PACKAGE  
AND RESPONSE TO COMMENTS

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 30, 1998 submittal, "AIPII IRDP Supplemental Package" and "Responses to OEPA Comments on the Draft (Revision D, September 1998) IRDP for AIPII". Attached are Ohio EPA's comments on the document.

If you have any questions, please contact Michelle Waller 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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OSDF. Any deviations from existing approved plans must be fully detailed in the revised IRDP.

9.) Commenting Organization: OEPA Commentor: OFFO

Section #: General Comment Pg. #: Line #: Code: C

Original Comment #:

Comment: The IRDP should be revised to differentiate between backfill areas lying within the footprint of the OSDF liner construction and those lying outside the footprint. Following this segregation, details regarding appropriate backfill for the area underlying the OSDF must be included. Ohio EPA believes this backfill should meet the compaction and material specifications for the OSDF clay liner.

10.) Commenting Organization: OEPA Commentor: OFFO

Section #: 1.1 Pg. #: 1-2 Line #: 23-24 Code: C

Original Comment #:

Comment: The area underneath the CG&E tower will need to be excavated, as has been done in the past, to reach FRLs. Please correct.

11.) Commenting Organization: OEPA Commentor: OFFO

Section #: 1.4 Pg. #: 1-4 Line #: 5 Code: C

Original Comment #:

Comment: This line incorrectly states that the WAC limit for total uranium is 82 mg/kg. Please correct.

12.) Commenting Organization: OEPA Commentor: OFFO

Section #: 1.4 Pg. #: 1-4 Line #: 13-14 Code: C

Original Comment #:

Comment: This section states that one of the two areas with above WAC uranium is northeast of the South Trickling Filter. According to Figure 1-4, this above WAC uranium contamination is northeast of the digester. Please clarify.

13.) Commenting Organization: OEPA Commentor: OFFO

Section #: 3.0 Pg. #: 3-1 Line #: 3-4 Code: C

Original Comment #:

Comment: According to A1PII IP (page 2-23), the reader is lead to believe that the west bed was constructed but never operated. This also is presented in several other sections of A1PII IP. Please clarify.

14.) Commenting Organization: OEPA Commentor: OFFO

Section #: 3.3 Pg. #: 3-3 Line #: Code: C

Original Comment #:

Comment: The approach taken in this section appears to be incomplete. See previous OEPA comment on DOE's Response to Comments describing excavation and scanning

approach.

15.) Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: Figure 1-1                      Pg. #:                      Line #:                      Code: C  
 Original Comment #:  
 Comment: This figure shows several areas that appear to be within AIIII, northwest of the STP, which show contamination above the FRL for uranium, yet are not being excavated. Please clarify.

16.) Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: Figure 1-3                      Pg. #:                      Line #:                      Code: C  
 Original Comment #:  
 Comment: Figure 2-23 from the AIIII IRDP (September 1998) shows Tc-99 contamination in the above WAC concentration of 228.00 pCi/g at the surface, as well as at depth, southwest of the South Tricking Filter. Figure 1-3 does not show this area to be above WAC for Tc-99. Please clarify.

17.) Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: Figure 1-7                      Pg. #:                      Line #:                      Code: C  
 Original Comment #:  
 Comment: Under Section A to A', sample 1441 shows an interval where the result is over the 20 mg/kg FRL. According to the contour lines provided in Figure 1-6, STP Deep Excavation Plans, this above FRL location is not planned to be excavated. Please revise excavation plans to include all sample locations above FRL.

18.) Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: Figure 1-7                      Pg. #:                      Line #:                      Code: C  
 Original Comment #:  
 Comment: Cross section C to C' still shows the digester as having a flat bottom, not a conical one. Please correct.

19.) Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: Figure 1-10                      Pg. #:                      Line #:                      Code: C  
 Original Comment #:  
 Comment: The STP Haul Road needs to be completed before the STP excavation begins. Please add that to this map.

20.) Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: Figure 4-1                      Pg. #:                      Line #:                      Code: C  
 Original Comment #:  
 Comment: The issue of storm water controls and the length of time the backfill stockpile would be sitting up gradient of the utility trench was discussed at a meeting between FDF and OEPA. At the time of the meeting, FDF was uncertain of the type of controls needed and

