



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

FILE: _____

February 11, 1999

RE: --DOE FEMP

COMMENTS: WPRAP DRAFT
REMEDIAL ACTION PACKAGE

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 draft Waste Pits Remedial Action Project Remedial Action Plan as supplemented by DOE's January 15, 1999 letter, "Waste Sampling for Operable Unit 1 Remediation.

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
Paul Pardi, DHWM
Ruth Vandergrift, ODH
Mark Shupe, HSI- GeoTrans, Inc.
Francie Hodge, Tetra Tech EM Inc.
Manager, TPSS/DERR, CO

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Ohio Environmental Protection Agency Comments on the
Draft Waste Pits Remedial Action Project
Remedial Action Package

General Comments

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Comment Pg #: na Line #: na Code: general
Comment: During the Remedial Design document review, a series of meeting were held between DOE, OEPA, FDF, and IT, concerning the ambient monitoring of radionuclides. While agreement was reached regarding particulate radionuclide monitoring, ambient radon monitoring was agreed to be addressed in the RAP. The RAP does not include any provisions for ambient radon monitoring. Please revise the document to include details regarding ambient radon monitoring

- 2) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code: general
Comment: It has recently come to Ohio EPA's attention that EnviroCare's permit has just been renewed and that the permit was changed significantly enough to affect several of the elements in this Package. We expect that the blending strategy to achieve compliance with isotope-specific activity limits will be changed completely. The changes to the blending plan will also affect the excavation strategy.
Similarly, changes to the permit also include very onerous consequences if characteristic hazardous wastes are discovered by the sampling to be carried out at the PCDF.
Our comments are being submitted under the assumption that all three (blending plan, excavation plan and sampling plan) strategies will be substantially re-written.

- 3) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code: general
Comment: Ohio EPA understands DOE is currently evaluating information regarding potential listed hazardous waste in the West Pit Area. A final conclusion on this matter and incorporation of any decision into the Remedial Action Package is necessary before the document can be approved by Ohio EPA.

Overview of Package

- 4) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.0 Pg #: 2 Line #: 22 Code: E
Comment: Change "Continency" to "Contingency".

O&M Plan

- 5) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.3.1 Pg #: 20 Line #: 27-31 Code: C
Original Comment #:
Comment: Will the CAM be connected to the PLC? If yes, what will the PLC response be for elevated radionuclide emission from the stack ? What are the alarm levels for beta/gamma and radon? (A table could be used to answer these questions.)

The Ohio EPA has no comments on the Appendix I and Appendix II of the O & M Plan.

O & M Plan, Appendix III

- 6) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Appendix III Pg #: 10 of 11 Line #: na Code: C
Comment: Table 7-1b under "Compliance Strategy" paragraph 2, states that residual contaminated soils from OU1 may be placed into the OSDF. This seems to contradict the plan ship all waste pit material to a CDF.
- 7) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Table 7.1c Pg #: 2 of 8 Line #: Code: c
Comment: (OAC) 3745-17-07(B) and 3745-17-8(B) have been incorrectly cited as the governing regulations for the particulate emissions from paved roads, unpaved roads and material storage piles. OAC 3745-17-07 is applicable to "old" sources that were in existence prior to February 15, 1972. OAC 3745-31-05(A) (cited on page 6 of 8) requires that new sources of emission employ the best available technology (BAT). The BAT determination is made on a case-by-case basis. However, activities such as controlling fugitive dusts from paved and unpaved roads and stockpiles have time and again resulted in standards that are more stringent than the standards cited in OAC 3745-17-07. In other words, BAT requires that more stringent controls be employed than the controls required by "reasonably available control measures" (RACM). The following examples have been taken from the Administrative Code for activities similar to those proposed in this Work Plan.

paved roadways	OAC 3745-17-12(F)(2)	1	minute	exceedence	in any	60-minute	period
unpaved roadways	3745-17-12(F)(1)	3	"	"	"	"	" "
material storage piles	3745-17-12(C)(2)	1	"	"	"	"	" "

The Ohio EPA has consistently maintained the position that the remedial activities at the FEMP should employ BAT and ALARA goals whenever feasible. Because the emissions of concern are from a Superfund action and the methods to comply with BAT do not require expensive, innovative or burdensome requirements, the Ohio EPA will not entertain any less stringent

standards than those that apply to quarrying operations.

Rewrite the Table omitting the references to OAC 3745-17-07 and 3745-17-08(B) and RACM. The Requirements Assessment and the Compliance Strategy outlined in the table are consistent with BAT with some exceptions such as the omission of several practical and implementable measures such as sweeping the roads and minimizing the drop height from loaders and excavators. The revised Table should be consistent with the FEMP Sitewide Dust Control Policy.

- 8) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Appendix III Pg #: 3 of 8 Line #: na Code: C
Comment: Table 7-2a under "Requirements Assessment" paragraph 2 begins with "If determined to be necessary..." The requirement under NESHAPs 40 CFR 61 is that if estimated emission (uncontrolled) result in greater the 0.1 mrem per year that continuous monitoring is required.
- 9) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Appendix III Pg #: 6 of 8 Line #: na Code: C
Comment: Table 7-2a under "Citation" Radon, states that BAT will be used to control fugitive radon emissions from waste pit materials. OEPA was under the understanding that ambient radon monitors would be set up on and around the WPRAP facility to ensure the effectiveness of BAT as applied to fugitive radon emissions.
- 10) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Appendix III Pg #: 7 of 8 Line #: na Code: C
Comment: Table 7-2a under "Substantive Permitting Requirements" misstates the time limits for visible emissions from paved and unpaved roadways. OAC 3745-17-08B is only a baseline for determining BAT for these air emission units. The correct time limits are 1 minute per 60 minutes, paved roadways; and 3 minutes per 60 minutes, unpaved roadways. (OAC 3745-17-12)

The Ohio EPA has no comments on Appendix IV O & M Plan.

Operations Environmental Control Plan

- 11) Commenting Organization: Ohio EPA Commentor: HCES
Section #: Pg #: Line #: Code: general
Comment: The emissions controls described appear to satisfy Substantive Permitting Requirements and BAT. No specific comments on this section.
- 12) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.1 Pg #: 8 Line #: Code: c

Comment: Several elements of the FEMP Sitewide Fugitive Dust Control Plan are not included in this Section. Add to this Section a commitment to employ methods such as limiting drop height from loaders and excavators, restricting operations during high winds, etc.

- 13) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 5.2 Pg #: 8 Line #: 45 Code: c
 Comment: Past experience at the FEMP has shown that watering of paved roadways is of limited effectiveness because under several environmental conditions roads can dry very quickly. The text should be revised to include a commitment to use a mechanical street sweeper.

Sampling and Analysis Plan

- 14) Commenting Organization: Ohio EPA Commentor: HCES
 Section #: Pg #: Line #: Code: general
 Comment: The plan provides an acceptable way to gather data to insure air emissions regulatory limits are met.
- Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: Pg #: Line #: Code: General
- 15) Comment: The supporting analyses are generally poorly documented or are not documented at all. For example, "weighted" averages and standard deviations are frequently referred to. The basis for the weighting, however, is never indicated. An assessment of the weighting calculations requires a detailed review of Appendix A which presents the statistical analysis for the SAP. Appendix A should be deleted or should be completely overhauled. The calculations, data, assumptions, etc. of the statistical analysis should be documented in text form as an appendix or in the main body of the report.
- 16) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: Pg #: Line #: Code: General
 Comment: Some readers of the SAP may not also read or have access to the other associated plans included in the larger document (e.g., Operations Environmental Control Plan, etc.). As a result, the SAP should be revised to include additional details or at least cross references to the other plans where appropriate. For example, the SAP indicates that a grab sample will be collected from the Storm Water Pond prior to discharging from the pond to Patty's Run. Is this sampling conducted in association with standard sitewide storm water management protocols and the NPDES permit or is it an independent activity? This information is provided in the Operations Environmental Control Plan but also should be summarized in the SAP.

- 17) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.

Section #: N/A Pg #: vi Line #: N/A Code: E
Comment: Add LSA-I, CIS, and RI/FS to the list of defined acronyms.

- 18) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: 1.3.5 Pg #: 5 Line #: 29 Code: C
Comment: The text should be revised to include a citation of the source document for the data that is mentioned in this sentence [i.e., RI Report for OUI (DOE, 1994)]. Further, although it becomes apparent that the samples were taken from the materials contained in the waste pits, the text should specifically state this.
- 19) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: 1.3.5 Pg #: 5 Line #: 45 Code: C
Comment: The document should be revised to provide a summary of the PCB and herbicide data and a description the analysis performed to identify general levels and trends in this data.
- 20) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: 1.3.5 Pg #: 6 Line #: 1 Code: C
Comment: The text should summarize the discussed weighting calculations. Apparently, pit characterization data from Table 2-2 from the WPRAP Excavation Plan (IT, 1998) or other source was used. The supporting data and calculations should be presented and discussed.
- 21) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: 1.3.5 Pg #: 6 Line #: 1 Code: C
Comment: Wet waste tonnages were apparently used in the weighting calculations. If so, why were wet tonnages used rather than dry (i.e. processed wastes from the rotary dryer)?
- 22) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: 1.3.5 Pg #: 6 Line #: 15 Code: C
Comment: The text should document the data and procedures used to select the VOAs, organics, BNAs, and pesticides considered in the statistical analysis.
- 23) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: 1.3.5 Pg #: 6 Line #: 20 Code: C
Comment: The previous studies referred to should be summarized or, at least, referenced.
- 24) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: 1.3.5 Pg #: 6 Line #: 25 Code: C
Comment: Appendix A as it is presented in this draft should be deleted. The analysis, data, assumptions, etc. of the statistical analysis should be documented in report form in a new

appendix or in the main body of the report.

- 25) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: 1.3.5.1 Pg #: 6 Line #: 30 Code: C
Comment: Based on the referenced text, it appears that the determination of normality in the statistical study consisted of simple visual inspection of the raw and arcsine transformed data histograms. The study should include a more rigorous normality assessment using the Shapiro Wilk test, particularly because the primary regulatory criteria used for WAC assessment (90th percentile on the mean concentration) is based on the assumption of a normal distribution.
- 26) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: 1.3.5.1 Pg #: 6 Line #: 33 Code: C
Comment: The text should include a suitable reference for the "Chebyshev theorem for skewed distributions." A check of the 90 percent Chebyshev limits presented in Appendix A indicates that they were calculated using the Chebyshev formula for the lower bound estimate of the fraction of measurements that are symmetric about the mean. The actual calculations, therefore, do not seem to be appropriate as the raw data appear skewed as noted in the text.
- 27) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: 1.3.5.1 Pg #: 7 Line #: 4 Code: C
Comment: The selection of a "trainload" as a sample container appears to be arbitrary without supporting justification. Specifically, the text should discuss how Envirocare will assess WAC compliance for each trainload. Will a composite sample be taken from the train as a whole or will individual cars be sampled? Based on the results of this sampling, will the entire train be returned to Fernald or will additional sampling be performed to isolate just the car(s) that fail WAC? If individual cars are rejected rather than the entire train, it would be more appropriate to treat each bin as a sample container. This unit should then be used in the determination of the required number of samples.
- 28) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: 1.3.5.3 Pg #: 7 Line #: 21 Code: C
Comment: PCB data and associated analyses are absent from the referenced text and Appendix A. The text should be amended to include a presentation of this information so that the claim that "PCB analysis is not statistically required" can be verified.
- 29) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: 1.3.5.5 Pg #: 7 Line #: 37 Code: C
Comment: The text should define what is meant by "the weighting formula for Envirocare."

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- 30) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: 1.3.5.5 Pg #: 8 Line #: 16 Code: C
 Comment: The sampling rate should be defined on a per unit volume basis (not per unit time). The assumption of a "trainload" as sample container should be reduced to the processing bin and the number of samples revised accordingly.
- 31) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: 1.3.5.6 Pg #: 8 Line #: 24 Code: E
 Comment: The sum of the factors shown is incorrect. The correct value is 5.24E-07.
- 32) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: 1.3.5.6 Pg #: 8 Line #: 30 Code: C
 Comment: The text states that the samples were collected "from around the pits" thus implying that they were collected from pit walls. The samples were actually collected from the pit contents.
- 33) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: 1.3.5.6 Pg #: 8 Line #: 36 Code: C
 Comment: The sampling rate should be defined on a per unit volume basis (not per unit time). The assumption of a "trainload" as sample container should be reduced to the processing bin and the number of samples revised accordingly.
- 34) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: 1.3.5.7 Pg #: 9 Line #: 18 Code: C
 Comment: U235 data and associated analyses are absent from the referenced text and Appendix A. The text should be amended to include a presentation of this information so that the claim that the estimated number of samples (three or fewer) can be verified as appropriate.
- 35) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: 2.1.2 Pg #: 11 Line #: 11 Code: C
 Comment: The sampling frequency should be defined as seven per bin rather than as one sample per hour.
- 36) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: 2.2.2 Pg #: 11 Line #: 46 Code: E
 Comment: The correct section reference appears to be 1.2.3.
- 37) Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 2.2.2 Pg #: 12 Line #: 1 Code: C

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Comment: The storm water from the SWM pond can not be discharged to Paddys Run. Based on data received by the Division of Surface Water in support of the NPDES renewal, this water must be treated on site before being discharged.

- 38) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.3.2 Pg #: 12 Line #: 43-46 Code: C
 Comment: More detail should be provided (as it becomes available) on the discriminatory radon monitoring of stack emissions. The performance goal of 0.01 Ci/hr appears large, what is the basis for this goal?
- 39) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: 3.2.2 Pg #: 23 Line #: 22 Code: C
 Comment: The WAC parameters should be identified as Envirocare WAC parameters. In addition, Chart 1 should be designated as a formal table within this document.
- 40) Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 3.2.4 Pg #: 25 Line #: 27-30 Code: C
 Comment: The storm water from the SWM pond can not be discharged to Paddys Run. Based on data received by the Division of Surface Water in support of the NPDES renewal, this water must be treated on site before being discharged.
- 41) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: 4.4.1 Pg #: 28 Line #: 6 Code: E
 Comment: The referenced text does not make sense.
- 42) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: 4.4.1 Pg #: 28 Line #: 13 Code: E
 Comment: The word "analyze" should be "analyte."
- 43) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: 4.4.1 Pg #: 29 Line #: 12 Code: E
 Comment: The referenced text is missing punctuation.
- 44) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: 4.4.1 Pg #: 29 Line #: 19 Code: C
 Comment: The derivation of the equation from the 10CFR71 equation for LSA-1 should be presented in the text.
- 45) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.

Section #: Table 1-3 Pg #: 33 Line #: N/A Code: E
 Comment: The acronyms used in this table need to be defined (e.g., Sxs, NR, etc.).

- 46) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: Tables 3.1 through 3.2.6 Pg #: 39 - 54 Line #: N/A Code: E
 Comment: The referenced tables should be assigned table numbers consistent with the table numbering scheme used in Sections 1 and 2 (e.g., Table 1-1, etc.).

Sampling and Analysis Plan, Appendix A

- 47) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: Appendix A Pg #: 68, 70, 72 Line #: N/A Code: C
 Comment: For the following constituents, why are the weighted averages zero and why is the variance not equal to zero (given that only one sample exists for the given waste pit): 1, 2-DCA in pits 4, 6, and the clear well; carbon tetrachloride in pits 4, 6, the burn pit, and the clear well; and vinyl chloride in pits 4, 6, and the clear well?

- 48) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: Appendix A Pg #: 69 Line #: N/A Code: C
 Comment: If four pits were excluded from the sample size calculations for 1, 2-DCA, why are $n - 7$ degrees of freedom used?

- 49) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: Appendix A Pg #: 71 Line #: N/A Code: C
 Comment: If four pits were excluded from the sample size calculations for carbon tetrachloride, why are $n - 7$ degrees of freedom used?

- 50) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: Appendix A Pg #: 72 Line #: N/A Code: C
 Comment: If three pits were excluded from the sample size calculations for vinyl chloride, why are $n - 7$ degrees of freedom used?

Performance Tests Criteria

- 51) Commenting Organization: Ohio EPA Commentor: HCES
 Section #: Pg #: Line #: Code: general
 Comment: The introduction to this section mentions Intent to Test procedures. It should be noted that a report on the results of the test should also be submitted as in the case of all performance tests.

52) Commenting Organization: Ohio EPA Commentor: HCES
 Section #: Pg #: Line #: Code: general
 Comment: The following reporting requirements should be incorporated into the plan.

1. DOE shall submit required reports in the following manner:
 - a. Reports of any required monitoring and/or record keeping information shall be submitted by mail to the two individuals as addressed below.
 - b. Quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted by mail to the two individuals as addressed below. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter.

The reports shall be submitted quarterly i.e. by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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Storm water/Waste water Management Plan

53) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3 Pg #: Line #: Code: general
 Comment: The Action item in response to Ohio EPA comment #14 on the draft final WPRAP Remedial Design Package stated that storm water and erosion controls for material stockpiles would be addressed in the Storm water Management Plan. Please add a Section to the SWMP that addresses storm water and erosion controls for material storage piles.

4) Commenting Organization: Ohio EPA Commentor: DSW

Section #: Pg #: n/a Line #: n/a Code: C

Comment: Section 1.3 of the SWMP states that "...the 25-year, 24-hour duration storm intensity would produce approximately 4.8 inches of precipitation in the region. Although greater intensity storm events are certainly possible, for the purposes of design, this has been accepted as the reasonable maximum design criteria to be used for sizing storm water management facilities." Each section then gives a volume of water expected to be generated from this storm event. However there is nothing to indicate what storm water management facilities are sized for or are capable of handling. For example there is no indication that the K-65 Runoff Basin or the Clearwell will be able to deal with the flows projected from this event. The Site Water Balance Process Stream Table only deals with average flow, there is no similar table that describes the peak flows during this event. We need to know that the storm water management facilities are sized for and will handle flows from the 25-year, 24-hour duration storm. If flows from OU1 will be combined with other flows, will the storm water management facilities be able to handle the combined flows. For example in Section 5.3, the flows from the 25-year, 24-hour duration storm in the early excavation phase the K-65 Runoff Basin will receive approximately 1,072,324 gallons of water from the waste pit area. If the K-65 Runoff Basin only holds 1,500,000 gallons, receives 1,000,000 gallons from other drainage areas and is not pumping out because of a termination to pump to the BSL, there may be an issue that requires a contingency. Or the pumping capacity of the K-65 Runoff Basin may not be sufficient to keep it from overflowing during this event. These are the situations that we would like to know the project has considered and is prepared for.

- 55) Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 6.2 Pg #: 19 Line #: 17-20 Code: C
 Comment: This section describes the installation of silt fences along the perimeter of open, disturbed areas which are under excavation. This is the typical incorrect installation of silt fence. This type of installation directs flow along the base of the fence to the low spot in the fence where the fence will be breached. The purpose of the silt fence is to act as a dam to hold water. The water will filter through the porous fabric slowly allowing any sediment to settle out. Additionally it may slow sheet flow to prevent erosion. The method of installation described in this section tends to concentrate flow at the low point of the silt fence so that additional erosion occurs. It is very important to install silt fence on the contour for it to function properly. Smaller lengths turned uphill at the ends to capture flow are preferred over perimeter fencing. Please see the ODNR manual *Rainwater and Land Development* for correct installation.
- 5) Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 7.2 Pg #: 20-21 Line #: NA Code: C

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Comment: It is difficult to understand the prioritization of termination to the BSL. The opening paragraph states that prioritization will be implemented roughly in the order presented. The third bullet from the end describes that bullet as receiving the highest priority and the second bullet being the highest priority. Having a clearly defined shutdown path with the streams identified as in the water balance flow diagram would make it unambiguous. As this sections reads, it is not clear what the shutdown priority is.

We believe that any activity that generates a stream to the BSL should be terminated in anticipation of a significant rain event. For example, activities that would cause decontamination water to be generated, or the WTS sand filters to need to be backwashed should cease. Frequent communication between the generator of streams in the waste pit area and the operators of the AWWT will be necessary during and in anticipation of significant precipitation events so that the project can anticipate a shutdown of the BSL as a receiving body and make adjustments accordingly.

The Ohio EPA has no comments on the Remedial Action Health and Safety Plan or the attachments.