



State of Ohio Environmental Protection Agency

Southwest District Office

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FERNALD _____

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LAST REV. _____

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George V. Voinovich
Governor

March 31, 2000

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

Re: COMMENTS - SILO 3 SITE PREPARATION PACKAGE

Dear Mr. Reising:

Ohio EPA has reviewed DOE's March 2, 2000 submittal, "Transmittal of the Silo 3 Project Site Preparation Packaged." Attached are our comments on the document.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Francie Hodge, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

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OHIO EPA COMMENTS ON
SILO 3 SITE PREPARATION PACKAGE

- 1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Comment Pg #:na Line #:na Code: C
Original Comment #:
Comment: Paving of areas west of the silos may increase surface water run-off to the surface water containment trench. Will the existing trench provide adequate drainage for increased run-off?

- 2. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 3.0 Pg #: 2 of 5 Line #: 21-22 Code: C
Original Comment #:
Comment: Sewage tanks need to have an alarm and be shut down when full.

- 3. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.0 Pg #: 2 Line #:37 Code: C
Original Comment #:
Comment: It is Ohio EPA's preference that in all possible instances bionengineering materials such as coir matting or vegetation be used to replace reliance on rip rap.

- 4. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.2 Pg #: 3 Line #:31-32 Code: C
Original Comment #:
Comment: These inspection reports should be made available to Ohio EPA for review upon request.

Pre-Operational Control Plan

- 5. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment A, section 2.2.2 Pg #: 4 of 18 Line #: 14-28 Code:
C
Original Comment #:
Comment: Check dams should be used in channels that have a design flow equal to or greater than 3 feet per second or as needed.

- 6. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment A, section 2.2.2 Pg #: 5 of 18 Line #: 30-33 Code:
C
Original Comment #:
Comment: Silt fence installation as described in this section is not reflected in the drawings. For example, in drawing 52-3012, silt fences are shown crossing contours concentrating

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water at low points (upper right in detention basin), crossing the silo, etc.

7. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.4 Pg #: 9 Line #: 36 Code: C
 Original Comment #:
 Comment: This bullet should be revised to state: "During dry conditions or as needed initiating dust control prior to start of shift and *continuing throughout the day as needed to minimize fugitive dust emissions.*" Note: italics added to denote change from original wording.
8. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.0 Pg #: General Comment Line #: na Code: C
 Original Comment #:
 Comment: This Waste Management Plan designates several stockpiles for the different waste types but does not specifically indicate where these stockpiles will be located. Due to the limitations on space in the silos area, prior planning for locating potential stockpile should be included in the Waste Management Plan.
9. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.4 Pg #: 15 Line #: Code: C
 Original Comment #:
 Comment: This section fails to refer to the WAC Attainment Plan or Sitewide Excavation Plan or to address the requirements of these document for soil excavation for disposition to the OSDF. Requirements that will need to be met include WAO oversight of excavation, manifesting of shipments, and categorization of loads to meet OSDF categories. The section should be revised to address WAC Attainment compliance.
10. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.4 Pg #: 16 Line #:7-9 Code: C
 Original Comment #:
 Comment: It would appear this section is discussing debris free-release, since no FEMP soils are to be free-released. Additional clarification is needed since debris is being discussed in the soils section.
11. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.4 Pg #: 16 Line #: Code: C
 Original Comment #:
 Comment: All efforts should be made to prevent the stockpiling of above WAC soils. If all other efforts fail, above WAC stockpiles must have liner material placed below them and

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a tarp on top.

Drawings

12. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Drawing 52-3012 Pg #: Line #: Code: C
Original Comment #:
Comment: The lower left figure appears to show silt fence running through silo 3. The drawing should be revised to show silt fence properly install along the contours.
13. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Drawing 52-3012 Pg #: Line #: Code: C
Original Comment #:
Comment: The addition of a legend to the figure showing the various symbols and definitions would be helpful.
14. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Drawing 52-3013 Pg #: Line #: Code: C
Original Comment #:
Comment: Cross section A should show silt fence installed at the toe of the vegetated slope.
15. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Drawing 52-3013 Pg #: Line #: Code: C
Original Comment #:
Comment: Ensuring good drainage across the storage pad is paramount. It will not be acceptable to store loaded waste containers in standing water.
16. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Drawing 52-3013 Pg #: Line #: Code: C
Original Comment #:
Comment: Ohio EPA is taking this opportunity again to state that this storage pad as designed will not be an acceptable replacement for the Plant 1 Storage Pad. DOE had previously suggested this may be used in the future as a replacement for Plant 1 storage this will not be acceptable.
17. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Drawing 52-3211 Pg #: Line #: Code: C
Original Comment #:

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Comment: Section D. Though not specifically noted on the drawing, Ohio EPA assumes the black squares are required waterstops within the sumps. The figure should be clarified to ensure the builder knows that waterstops are necessary within all sump construction.

Appendix

- 18. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Appendix A Pg #: Temporary Diversions Line #: Code: C
 Original Comment #:
 Comment: Ohio EPA has observed that in most cases matting is necessary to establish vegetation on nearly all slopes at Fernald. Additionally, in most cases matting is sufficient for all but the steepest slopes and that engineered slope stabilization is seldom necessary.

Technical Specifications

- 19. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Attachment C Pg #: Line #: Code: C
 Original Comment #:
 Comment: It is unclear from these technical specifications the role of the Fluor Fernald Construction Manager. The specifications we are familiar with specifically require approval of the FF Construction Manager prior to any change or deviation from the specs or plans. Additional clarification of who the "Contractor" and subcontractor being referred to in the specs is also necessary.
- 20. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Spec 02223, 3.1(B) Pg #: 3 Line #: Code: C
 Original Comment #:
 Comment: The text refers to spec 02935. This specification is does not exist in the package submitted to Ohio EPA.
- 21. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Spec 02485, 3.2(A) Pg #: Line #: Code: C
 Original Comment #:
 Comment: The text refers to spec 02200. This specification is does not exist in the package submitted to Ohio EPA.
- 22. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 02485 Pg #: 2 of 7 Line #: G Code: E
 Original Comment #:

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Comment: "The blanket sha;; have" should read "The blanket shall have"

23. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Spec 02900, 2.1 Pg #: 3 Line #: Code: C
Original Comment #:

Comment: Ohio EPA understands the site-wide seeding specification is being revised to change the species planted and the rates. The specification should be revised to incorporate the new seeding spec. Ohio EPA recommends contacting Fluor Fernald's Natural Resources group.

Trailer Data

24. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment E Pg #: na Line #: na Code: C
Original Comment #:

Comment: Office trailers with sanitary facilities should be tied in to the sites sanitary waste system. If this is not possible, temporary holding tanks can be used if alarmed, shut down when full, and pumped out routinely.