



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

FILE:
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April 8, 1999

RE: DOE FEMP
CONDITIONAL APPROVAL:
A1PII SUPPLEMENTAL
CHARACTERIZATION PACKAGE

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 February 15, 1999 submittal, "Area 1, Phase II Supplemental Characterization Package and Response to Comments". Based upon our review, Ohio EPA conditionally approves the A1PII Supplemental Package. The conditions for Ohio EPA approval include acceptable resolution and incorporating of the following:

- 1) Commenting Organization: OEPA Commentor: OFFO
 Section #: 3.3 Pg. #: 3-3 Line #: 13-17 Code: M
 Original Comment #:
 Comment: This section states that *filter fabric used to separate digester sludge from the sludge cake will be disposed based on whether it contacted with the sludge cake* (WMB or SP-7). Ohio EPA believes that it would be very difficult to determine what parts of the filter fabric contacted the sludge cake and which parts did not. Considering this and that the sludge cake is a RCRA Listed Waste, Ohio EPA believes that DOE must dispose of the filter fabric as a Listed Waste.

- 2) Commenting Organization: OEPA Commentor: OFFO
 Section #: Figure 4-1 & 4-3 Pg. #: Line #: Code: M
 Original Comment #:
 Comment: Ohio EPA does not agree to the method of placing subsurface soil (backfill) upon the adjacent surface soil which needs to be stripped 6 inches to meet FRLs, and informing the contractor to be "careful not to over excavate into existing surface soils". This leaves too much potential for soil which is characterized for disposal in the OSDF to be placed into the trench during backfill operations. Three acceptable ways of correcting this situation are:
 1. Place geotextile on the ground before removing backfill to form a barrier between the backfill and adjacent surface soil designated as above FRLs to prevent possible mixing.



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2. Excavate subsurface soil (backfill) and place it on top of adjacent soil as planned. When backfilling the trench, leave a minimum of 2 inches of the backfill pile to ensure no topsoil is disturbed. This remaining backfill will then be excavated as part of the 6 inch stripping operation.
3. Strip the utility line areas before excavating.

- 3) Commenting Organization: OEPA Commentor: OFFO
 Section #: General Pg. #: Line #: Code: C
 Original Comment #:
 Comment: DOE is expected to submit full copies of all DCN's which affect this project to the Agencies.

- 4) Commenting Organization: OEPA Commentor: OFFO
 Section #: 1.3, fourth bullet Pg. #: 1-3 Line #: 29-31 Code: E
 Original Comment #:
 Comment: a) On line 29 it states that the *solid black line*, on Figure 1-3, denotes the *excavation limit*. Figure 1-3 shows a dashed not a solid line. Please correct.
 b) On line 31 there is a typo. Please change -AC to WAC.

- 5) Commenting Organization: OEPA Commentor: OFFO
 Section #: 1.4 Pg. #: 1-4 Line #: 21-22 Code: C
 Original Comment #:
 Comment: These lines state that there is an above-WAC uranium area northeast of the South Trickling Filter, when it was agreed upon in RTC #12 that the area referred to is northeast of the *Digester*. Please correct.

- 6) Commenting Organization: OEPA Commentor: OFFO
 Section #: 1.4, Figure 1-4 Pg. #: 1-4 Line #: Code: E
 Original Comment #:
 Comment: The text in Section 1.4 does not coordinate with Figure 1-4.
 a) The text states that the solid red line denotes above WAC uranium contamination. However on Figure 1-4, the above WAC uranium areas are shown by an outline of a solid red line with black diagonal lines running through the designated area. In addition, the figure illustrates that the above WAC Tc-99 areas are outlined with a solid red line. Please correct and coordinate Figure 1-4 with the text in Section 1.4.
 b) Please add a definition for the black dashed line to the Key on Figure 1-4.

- 7) Commenting Organization: OEPA Commentor: OFFO
 Section #: 1.6, Figure 1-10 Pg. #: 1-6 Line #: Code: E

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Original Comment #:

Comment: Typo on Figure 1-10. Change "Pootprint" to "Footprint".

8) Commenting Organization: OEPA Commentor: OFFO
 Section #: 4.3 Pg. #: 4-2 Line #: 18-19 Code: C

Original Comment #:

Comment: This section discusses backfilling trenches within the OSDF cell liner footprint with CL material, but does not specify that soil or compaction will meet OSDF standards. Please correct.

9) Commenting Organization: OEPA Commentor: OFFO
 Section #: Figure 1-6 Pg. #: Line #: Code: C

Original Comment #:

Comment: The contour lines for deep excavation on this figure do not match those on Figure 1-7. At boring 1441, excavation is designed to reach approximately 579 feet to capture known contamination, while figure 1-6 only shows the depth at 587-588 feet. Please correct.

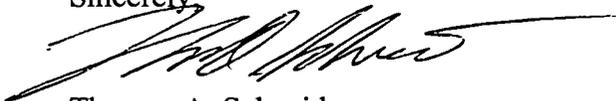
10) Commenting Organization: OEPA Commentor: OFFO
 Section #: Figure 7-4 Pg. #: Line #: Code: E

Original Comment #:

Comment: Please correct the spelling of *certification* in the title of the map at the bottom of Figure 7-4.

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