



State of Ohio Environmental Protection Agency

Southwest District Office

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

FERNALD _____

LOG A-0482

DEC 30 8 15 AM '99

FILE: _____

LIBRARY: _____

2-408.94
= 2705

George V. Voinovich
Governor

December 28, 1999

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

Re: IMPP ADDENDA 2, 3, AND 4 RTC, AND ADDENDUM 5 SUBMITTAL

Dear Mr. Reising:

This letter provides as an attachment Ohio Environmental Protection Agency comments on the RTC package for Addenda 2, 3, and 4 of the Impacted Materials Placement Plan and our comments on the first submittal of Addendum 5 to the IMPP.

If you have any questions, please contact Tom Ontko or me.

Sincerely,

Tom Ontko

for

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

Q:\femp\ou2\add2345.wpd

1

Ohio Environmental Protection Agency Comments on the
RTC to Addenda Nos. 2, 3 and 4 to the
Impacted Materials Placement Plan

Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code: c
Original Comment #: 2

Comment: The response is satisfactory and we agree that adequate placement restrictions are being implemented. For completeness, please add a table to the IMPP that details all of the placement restrictions.

Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code: c
Original Comment #: 3

Comment: The action to require a minimum of 15 inches of Category 1 cover over the thorium material satisfactorily addresses our concern that compacting equipment might cause thorium material to rise to the top of the lift.
An additional concern not addressed is the compacting efficiency of the smooth-drum vibratory compactor. We are persuaded that the chopping blade of the Cat 826 is not suitable for compacting the first lift of cover. We are not convinced that the vibratory roller will provide sufficient compaction. Unless a persuasive argument is forth-coming, the text should be revised to limit compaction of the initial lift to the double-drum compactor. We believe that both compactors (self-propelled double drum and Caterpillar 826) will perform satisfactorily on subsequent lifts and the text should make it clear that both are acceptable.

Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code: c
Original Comment #: 5

Comment: The commitment to proof roll the final lift of Category 1 material is acceptable.
We disagree that debris as dropped from a roll-off box will "closely resemble an 18-inch thick loose lift." Our recollection is that the lift will be thicker than that. We also disagree that in order to spread the debris, a dozer or compactor would have to directly contact the thorium debris. We believe that the material could be spread in thinner lifts using the backhoe bucket.
Provide alternate text that calls for spreading the thorium material into thinner lifts with a backhoe bucket prior to the placement of the first cover lift.

Mr. Johnny Reising
December 28, 1999
Page 2

Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code: c
Original Comment #: 9

Comment: The response is acceptable except for the language that permits the vibratory roller to be used for compaction. We are not convinced that the vibratory roller will provide sufficient compaction. Unless a persuasive argument is forth-coming, the text should be revised to limit compaction of the initial lift of Cat 1 to the double-drum compactor.

Comments on Addendum 5

1) Commenting Organization: Ohio EPA Commentor: ODH
Section #: Pg #: Line #: Code: general
Comment: The Plan specifies alternate placement procedure for transite panels. The Ohio EPA has serious problems with the new procedure.

1. The existing placement methods perform satisfactorily.
2. Placing bundles of transite in close proximity will increase the possibility that the panels will be damaged during placement and create friable asbestos.
3. Section 8.4.1 of the Impacted Materials Placement Plan requires that individual items having voids greater than 1 cubic foot be filled with grout. The voids that result from placing two transite bundles a maximum distance of two inches apart will be several times larger than that. In the case of bundles of transite that are placed end to end, the resulting void between two bundles is 2.7 cubic feet. (4 feet high X 4 feet wide X 2 inch separation) In the case of bundles placed side-by-side, the resulting void will be 5.3 cubic feet.(4 feet X 8 feet X 2 inch separation) We realize that these are estimates of maximum voids and that some of the space would be filled with Category 2 material. On the other hand, the transite panels will not be stacked perfectly evenly and there will be gaps greater than the two inches we used to estimate the void volume.

Unless the Department of Energy can develop a convincing argument to the contrary, this proposal should be abandoned as being unnecessary.