



Department of Energy

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FEB 14 2000

Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V, SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0395-00

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE DRAFT INTEGRATED REMEDIAL DESIGN PACKAGE FOR AREA 2,
PHASE III PART TWO**

Dear Mr. Saric and Mr. Schneider:

Reference: Letter, T. Schneider to J. Reising, "Comments - Implementation Plan for
A2PIII Part Two and DCN 20402-98," dated January 25, 2000

Enclosed for your review are responses to the Ohio Environmental Protection Agency (OEPA) comments on the draft Integrated Remedial Design Package (IRDP) for Area 2, Phase III Part Two. This IRDP consists of the draft Implementation Plan and Design Change Notice (DCN) 20402-98, Radium Excavation. The Implementation Plan will be revised per the comment responses upon approval.

Mr. James A. Saric
Mr. Tom Schneider

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If you have any questions regarding these comment responses, please contact Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

Enclosure

cc w/enclosure:

G. Jablonowski, USEPA-V, SRF-5J
T. Schneider, OEPA-Dayton (three copies of enclosure)
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
F. Barker, Tetra-Tech
AR Coordinator, FDF/78

cc w/o enclosure:

N. Hallein, EM-42/CLOV
K. Nickel, OH/FEMP
R. J. Janke, OH/FEMP
A. Tanner, OH/FEMP
J. Blankemeyer, Fluor Fernald/52-0
D. Carr, FDF/52-2
J. Chiou, Fluor Fernald/52-0
T. Crawford, Fluor Fernald/52-0
T. Hagen, FDF/65-2
J. Harmon, FDF/90
S. Hinnefeld, FDF/31
M. Jewett, Fluor Fernald/52-2
M. Rolfes, Fluor Fernald/60
T. Walsh, Fluor Fernald/65-2
ECDC, Fluor Fernald/52-7

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE DRAFT IMPLEMENTATION PLAN FOR AREA 2, PHASE III PART TWO
AND DESIGN CHANGE NOTICE 20402-98, RADIUM EXCAVATION
(20460-PL-0001, REVISION B)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENTS

Commenting Organization: Ohio EPA
Section #: General Comment Pg. #: Line #: Commentator: OFFO
Original Comment #: 1 Code: C

Comment: This area would be a good candidate for a trial run at expedited certification. We all know that areas where water will pond require quicker certification than has occurred in the past. Quicker certification will save substantial cost and effort to prevent contractor remobilization for water removal as will be required for the STP. DOE should include a proposal for expediting certification of this area.

Response: Agree. DOE proposes to submit a draft Certification Design Letter (CDL) for this area prior to remediation. The CDL will propose Certification Units (CUs) and certification sample locations based on the remediation boundaries presented in the Implementation Plan. Directly upon completion of remediation, precertification measurements will be conducted over the area in accordance with the PSP for A2PIII Precertification Real-time Scanning (DOE 1999). Modifications of the CUs and certification samples may then occur, based on the data collected during precertification and the final topography after remediation. A draft PSP for the A2PIII Part Two Certification Sampling will accompany the draft CDL submittal to facilitate the expedited certification effort for A2PIII Part Two.

Action: The draft CDL and certification PSP will be submitted to the agencies prior to remediation of A2PIII Part Two in order to support the quicker certification of the area.

Commenting Organization: Ohio EPA
Section #: General Comment Pg. #: Line #: Commentator: OFFO
Original Comment #: 2 Code: C

Comment: The document is unclear about the process for seeding either permanent or interim. Ohio EPA expects the area will be appropriately seeded upon completion of the project. We recommend a permanent seed mix that contains wet prairie/meadow species since the area appears to be capable of supporting such a habitat. We would be glad to work with DOE on developing an appropriate mix.

Response: Comment noted; permanent seeding will be applied in the A2PIII Part Two area. OEPA's proposed seed mix will be incorporated into the seed mix developed for the A2PIII Part Two area to support OEPA's recommendation of establishing a wet prairie/meadow habitat. Bioengineering techniques for stabilization of the outlet area will be adopted, including the use of coir matting, and the area more amenable to a wet prairie/meadow habitat.

Action: Section 3.6 of the Implementation Plan will be revised to clarify DOE's plan to implement permanent seeding. Text will be revised to read "Following removal of impacted material from A2PIII Part Two and precertification scanning, A2PIII Part Two will be permanently seeded. It is planned for the seed to be hand broadcasted and raked prior to the installation of coir matting."

Commenting Organization: Ohio EPA
Section #: General Comment Pg. #: Line #: Commentator: OFFO
Code: C
Original Comment #: 3

Comment: Following remediation it appears the area would support a wet prairie/meadow habitat with minimal effort. The supplementing of post-remediation soil with hydric soils from the former Trap Range following certification would greatly aid in restoration of the area.

Response: The application of hydric soils from the former Trap Range to supplement the soils in the A2PIII Part Two radium excavation can only take place after the completion of certification of both the former Trap Range and the A2PIII Part Two radium excavation area. Once both of these areas are certified, this option will be considered and evaluated.

Action: No action at this time.

SPECIFIC COMMENTS

Commenting Organization: Ohio EPA
Section #: DCN Pg. #: Line #: Commentator: OFFO
Code: C
Original Comment #: 4

Comment: Additional modifications to the outlet structure are needed including: a) requiring the use of staples to secure the coir matting; b) using permanent seed mix raked in under the matting; and c) installing dormant willow cuttings into the berms to provide additional support and vegetation. Details for willow cutting placement and seeding under the matting can be found in the Paddys Run bioengineering plan.

Response: The details shown on the DCN are intended to direct the work that the contractor will be performing during the remediation of the area. The details of the coir matting placement and seeding directions were therefore intentionally omitted from the detail. It is DOE's intention to implement the measures that OEPA has suggested. See response to OEPA Comment No. 2.

Action: The DCN will be revised to show the general use of bioengineering techniques at the outlet structure, to be implemented by others, and will include the modifications as suggested.

Commenting Organization: Ohio EPA Commentator: OFFO
Section #: DCN and 1.5.1 Pg. #: 1-8 Line #: Code: C
Original Comment #: 5

Comment: OEPA has concerns that the proposed loading and hauling route will work. The clean loading and hauling that was done as part of the STP project was so that trucks would never have to enter a contamination zone. In the proposed hauling of this radium material, trucks will enter the OSDF and be considered contaminated. Based on prior experience, OEPA does not feel that it is reasonable to expect each truck to be scanned and free released every trip in a time period which would facilitate continual hauling of this material. It is likely for the proposed haul route to work, all roads traveled upon will need to be posted and closed to other traffic until all work is completed and the road officially downgraded.

Response: The approach for the haul vehicles from the A2PIII Part Two radium excavation is similar to the approach implemented for the removal of the AWWT stockpile, which was also transported to the OSDF. During the removal of the AWWT stockpile, the haul vehicles were scanned and free released successfully in a timely manner. This previous experience indicates that the posting and closure of the travel route is not necessary. Since the scanning and release time is increased during wet weather, the timing of this activity will be delayed (weather permitting) to later in the season in order to take advantage of dryer weather during excavation.

An alternate haul route is also being provided to the contractor in the event that the work would be performed over a weekend. This alternate route will access the Impacted Material Haul Road at the silos crossing. Upon their return, the trucks will be scanned and free released at the silos crossing before leaving the Impacted Material Haul Road.

Action: The DCN will be revised to reflect the alternative haul route for weekend work.

Commenting Organization: Ohio EPA Commentator: OFFO
Section #: 1.0 Pg. #: 1-2 Line #: Code: C
Original Comment #: 6

Comment: Ohio EPA is not a party to DOE and USEPA's ACA. The text should be revised.

Response: Comment noted.

Action: Text will be revised to delete reference to OEPA as a participant in the ACA.

Commenting Organization: Ohio EPA Commentator: OFFO
Section #: Figure 2-3 Pg. #: Line #: Code: C
Original Comment #: 7

Comment: The Tc-99 and K-40 data for location RA 5 appear to be reversed. Please correct.

Response: Comment noted; this was a typographical error.

Action: Figure will be revised to correct the data for location RA 5.

Commenting Organization: Ohio EPA
Section #: Figure 2-3 Pg. #: Line #: Commentator: OFFO
Original Comment #: 8 Code: C

Comment: Ohio EPA believes that 3' is a more appropriate excavation depth based upon review of the data. Excavating to 2.5' leaves soil at or near the FRL suggesting a high probability of failing certification. Ohio EPA recommends excavation to 3' in order to decrease the likelihood of failing certification and remobilizing for additional excavation.

Response: Comment noted; excavation depth is being revised to a depth of 3 feet. Additionally, the tolerance of 2 inches deeper excavation than the design has been increased to 6 inches to allow greater flexibility in the field.

Action: The DCN will be revised to show a general excavation depth of 3 feet and a tolerance of 6 inches deeper, except where otherwise noted (6-inch stripping area surrounding the trees).

Commenting Organization: Ohio EPA
Section #: Figure 3-1 Pg. #: Line #: Commentator: OFFO
Original Comment #: 9 Code: C

Comment: The Tc-99 and K-40 data for location RA 5 appear to be reversed. Please correct.

Response: See response to OEPA Comment No. 2.

Action: See action for OEPA Comment No. 2.

Commenting Organization: Ohio EPA
Section #: Appendix A Pg. #: Line #: Commentator: OFFO
Original Comment #: 10 Code: C

Comment: There are two Appendix A's at the end of the document. Please correct.

Response: Comment noted; the first Appendix A is an inadvertent duplication of Table A-3. This will be removed.

Action: Appendix A will be included once.

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