



State of Ohio Environmental Protection Agency

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George V. Voinovich  
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February 18, 2000

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

**RE: STOCKPILE AMENDMENT TO WPRAP EXCAVATION PLAN**

Dear Mr. Reising:

This letter responds to the Stockpile Amendment to the final WPRAP Excavation Plan that was transmitted via your letter DOE-0265-00.

Section 4.7 of the Excavation Plan (Volume 2 of the WPRAP Remedial Design Package) provided for three situations in which materials would be staged in or near the waste pits instead of being immediately transferred to the Material Handling Building: processable waste requiring free water drainage, non-processable waste and non-typical waste. The current debris pile falls under the category of 'non-processable'. This material is being worked away in railcars to honor the 10% debris limitation.

A second pile being maintained is the 'waste pit cover soils pile'. This material will be used when dry material is needed to construct haul roads within the waste pit area. It is conveniently located and run-off is controlled. Although this pile is not specified in the excavation plan, we believe that because it is relatively uncontaminated it is preferable to stage this material rather than import road materials from another location.

The proposed amendment creates yet another type of stockpile which is not mentioned in the Excavation Plan. The text states, "Within the excavation area, various materials may be staged, in support of the overall materials management process....[M]aterials may be staged ...to facilitate blending or materials handling." One use of the "support" piles would be to stage piles with higher activity " until such time as blending can be facilitated". It is unclear why the need for these support piles was not anticipated in the design process nor is it clear what functions other than operational convenience that the "support" piles will

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Mr. Johnny Reising  
February 18, 2000  
Page 2

fulfill. It is also unclear why this blending could not be performed inside the Material Handling Building (MHB) where it could be accomplished under tighter controls. Materials of higher activity should not be consolidated into piles outside the MHB.

To summarize, the Ohio EPA approves stockpiling of materials within the waste pits only in the following cases:

1. draining free liquids from processable wastes;
2. staging of non-processable debris until it can be worked away;
3. staging of pit cover materials for use in building roads;
4. non-typical wastes.

We do not approve of the creation of stockpiles in support of the overall materials management process.

The following summarizes our expectations of the controls to be placed for fugitive dusts, run-on/run-off and the duration of the four previously listed stockpiles respectively:

1. "Processable wastes will only be staged within the pit for the time reasonably required." (Section 4.7 of the Excavation Plan). Run-off will be controlled because these piles will be located within the excavation area. "At the end of each working shift and whenever inclement weather (high winds, rain, etc.) is expected staged materials will be secured to preclude dust generation by proof-rolling, or bucket compacting to provide a tight surface, or covering with a fabric cover, or by spraying with polyshell or equivalent".
2. To date this material has been the large fraction of wood excavated in Pit 3. It is our expectation that continuing progress be made to load this material out within the 10% maximum debris restriction imposed by the disposal facility. We expect that tarps, water sprays or ConCover would be used to control fugitive dusts. This pile is located so that run-off is directed to the Clearwell.
3. Run-off from this pile is directed to the Clearwell. Because this material is needed to build roads we expect that it will be covered with a tarp although the fugitive dust control plan would allow it to be smooth-rolled and crusted. The Ohio EPA would entertain proposal to plant a vegetative cover if it were likely that the pile would not be needed for a longer time. Because this pile may have a long life time, we expect that the effectiveness of the fugitive dust control will be periodically evaluated and that measures would be taken to re-establish the controls before they deteriorated to the point of diminished effectiveness.
4. These materials would be transferred to FDF for further handling and disposal when enough material has accumulated to make up one load.

Mr. Johnny Reising  
February 18, 2000  
Page 3

If you have any questions, please contact Tom Ontko (937) 285-6073 or me (937) 285-6466.

Sincerely,



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

cc: Jim Saric, U.S. EPA  
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