



State of Ohio Environmental Protection Agency

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FERNALD _____

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George V. Voinovich
Governor

February 22, 2000

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

RE: FUGITIVE DUST FROM OFF-ROAD CONSTRUCTION VEHICLES DOE-0393-00

Dear Mr. Reising:

This letter responds to your correspondence (DOE-0393-00) requesting alternative methods for control of fugitive dusts from articulating trucks. During the past two construction years all haul trucks were equipped with automatic tarps and standard procedures were instituted under which trucks would only be driven when the tarps were in place regardless of whether the trucks were hauling material or were traveling empty. Fugitive emissions from these trucks were for the most part satisfactorily controlled with problems caused by dusty roads and gusty winds more common than problems caused by dust originating from the loads.

The current request proposes using a spray bar located in the Southern Waste Units Equipment Wheel Wash to moisten the loads prior to the vehicles entering the Haul Road for the trip to the OSDF. Other controls proposed include adding crusting agents/surfactants to the water and limiting vehicle speeds.

The Ohio EPA concurs that the use of articulated trucks will need to be increased this year over the previous two years because of steeper grades in Cell 1 and the increased maneuverability of articulated trucks over dual-wheeled tandem axle trucks. However, we have the following questions and comments:

1. Will the beds of trucks making the return trip from the OSDF be wetted at the OSDF wheel wash?
2. Will provisions be available to increase the quantity of water used or implement a crusting agent when the soils are dryer or winds are stronger?

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3. Will revisions need to be made to the posted speed limit (or to the maximum wind speed allowed prior to stopping work) to make this proposal successful?

A strong case can be made that the FEMP has established that the Best Available Technology (BAT) for the control of fugitive dusts originating from the loads of haul trucks is in fact covering the loads with an automatic tarpaulin. However, we are willing to participate in evaluating whether the proposed technology is equivalently protective. We suggest that DOE devise a program to implement the proposal on a trial basis. The trial program should contain the following elements:

1. A method to quantify fugitive emissions from trucks
2. A monitoring program
3. A method to evaluate whether the proposed method is effective in all types of weather

We are skeptical of this proposal because the use of tarps has been successful in controlling fugitive dusts during the past two construction years. We doubt that the use of water spray will be adequate during dry and windy weather.

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

Sincerely,



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

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