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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-0436-00

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

Dear Mr. Saric and Mr. Schneider:

RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS CONCERNING FUGITIVE DUST CONTROL FROM OFF-ROAD CONSTRUCTION VEHICLES

- References:
- 1) Letter, from T. Schneider, OEPA, to J. Reising, DOE-FEMP, "Fugitive Dust From Off-Road Construction Vehicles DOE-0393-00," dated February 22, 2000
 - 2) Letter, DOE-0393-00, from J. Reising to J. Saric, U.S. EPA and T. Schneider, OEPA, "Proposed Dust Control Best Available Technology for the Off-Road Construction Vehicles," dated February 14, 2000

This letter responds to the Ohio Environmental Protection Agency (OEPA) comments (Reference 1) and reiterated below, regarding the proposed use of articulating trucks without tarps (Reference 2) for hauling material from various soil excavation areas to the On-Site Disposal Facility (OSDF) through the Impacted Material Haul Road (IMHR).

The OEPA raised several questions regarding the alternative practice for controlling fugitive emissions from the haul vehicles. The following responses address those issues:

- Will the beds of trucks making the return trip from the OSDF be wetted at the OSDF wheel wash?

Yes, the wheel wash facility at the OSDF will also be equipped with a spray bar to wet the bed of the haul vehicles on the return trip prior to accessing the IMHR.

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- 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?

Yes, both the OSDF and Southern Waste Unit (SWU) equipment wash facilities will be operated in such a manner that quantity of water can be increased. If additional water is still not effective in controlling dust emissions from the vehicles, then a solution of crusting agent/surfactant and water would be applied to the material in place of water alone.

- 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?

The present maximum speed limit of 20 miles per hour will be maintained initially. The criteria for controlling fugitive dust emissions do not change with the proposal of using untarped articulating trucks regardless of truck speed or wind. Therefore, the speed limit or acceptable wind speeds while hauling do not require revision unless it is determined necessary during operation based on actual performance of the dust controls.

The use of articulated trucks without tarps will start as a trial program as suggested. The elements that the OEPA also suggests be included in a monitoring program to evaluate the effectiveness of dust control during the trial are presently in place and practiced through surveillances by both the site regulatory compliance monitoring program as well as the project's Quality Assurance/Quality Control program. Specific elements suggested include the following:

- A method to quantify fugitive emissions from trucks. Method 22, "Visual Determination of Fugitive Emissions from Material Sources and Smoke Emission from Flares," is used to quantify fugitive emissions. Fluor Fernald regulatory compliance will continue periodic monitoring using Method 22 for the duration of excavation, transportation, and disposal activities and compare observations from differing weather conditions.
- A monitoring program. A monitoring program is currently in place through contractual requirements on the contractor as well as Fluor Fernald independent surveillances.
- A method to evaluate whether the proposed method is effective in all types of weather. The current program addresses all types of weather, and includes the excavation, transportation, and placement of material. As stated above, the site-specific limits for fugitive dust emissions have been established and are a constant that must be maintained independent of weather conditions. Fluor Fernald construction managers have full authority and will stop work at any time when unacceptable dust emissions are identified.

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Dust control was implemented (water spray on the material) and the fugitive emissions were sufficiently controlled in previous excavation seasons, as indicated by OEPA. Field monitoring by both Fluor Fernald and contractor personnel ensures that the fugitive emissions are minimized at all times. This same monitoring program will continue during the upcoming excavation season, with the incorporation of personnel also monitoring the vehicles on the IMHR.

We feel that the programs and practices that are currently in place are adequate to monitor the effectiveness of the dust control measures during excavation, transportation, and placement of materials. However, more surveillances will be conducted this season to ensure that the new dust control measures for the articulating trucks are effective at all times. As always, OEPA is welcome to visit the project and observe the excavation and transport activities.

If you have any questions or need further information, please contact Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising
Fernald Remedial Action

FEMP:Jalovec

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