



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

April 28, 2000

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

Re: COMMENTS - AWR SITE PREPARATION PACKAGE

Dear Mr. Reising:

Ohio EPA has reviewed DOE's April 5, 2000 submittal, "Silos 1 and 2 Accelerated Waste Retrieval Project Site Preparation Package." Attached are our comments on the document. Please note these comments address only site preparation activities although some drawings show later activities. A lack of comments on these future activities should not be taken to mean agency concurrence with them.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

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

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**OHIO EPA COMMENTS ON
AWR SITE PREPARATION PACKAGE**

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Comment Pg #: Line #: Code: C
Original Comment #:
Comment: The document does not address the proposed laydown area located within A2P2 yet is shown on drawing #05FCD014. Since no discussion or details on the area are provided in the document it obviously won't be utilized or disturbed during site prep activities. If use of the area is planned during site prep the document will require modification.

2. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 8.0 Pg #: 6 Line #: Code: C
Original Comment #:
Comment: Since DCNs constitute changes to an approved CERCLA deliverable, Ohio EPA expects the opportunity to review and approve DCNs prior to implementation. Submittal simply for information is not acceptable.

- Pre-Operational Control Plan

3. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Attachment A, section 2.1 Pg #: 3 Line #: Code: C
Original Comment #:
Comment: Trucks should be covered at all times whether full or empty to prevent fugitive emissions and to comply with the site Dust BAT plan.

4. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Attachment A, section 2.2 Pg #: 4 Line #: Code: C
Original Comment #:
Comment: The last paragraph references sediment traps on drawing 66FCDOO2 though that drawing shows no sediment traps. Please correct.

5. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment A, 2.2 Pg #: 4 Line #: NA
Original Comment #:
Comment: This states that details are in drawings 66FCD001 through 66FCD006. However drawings 66FCD001-66FCD004, 66FCD006, and 66FCD007 are in the package.

6. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment A, 2.2 Pg #: 4 Line #: NA
Original Comment #:

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Comment: This states that "...a few culverts cross the southern perimeter road..." Please state how many so that we can locate all of them on the drawings.

7. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Attachment A, section 2.2.1 Pg #: 5 Line #: Code: C
 Original Comment #:
 Comment: Ohio EPA recommends employee training regarding BMPs for erosion and stormwater controls. Recommend use of video training course developed by Ohio Homebuilders Association and ODNR.

8. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Attachment A, section 2.2.2 Pg #: 6 Line #: Code: C
 Original Comment #:
 Comment: The section does not reference the concrete water diversion shown on drawing 66FCDOO2. Additional clarification is needed.

9. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Attachment A, 2.3 Pg #: 7 Line #: NA
 Original Comment #:
 Comment: This states that culvert entrances and exits are to be protected with rip rap or geofabric. Response to comment 7 (page 2 of response to written comments, Attachment D) indicates changes would be made to section 2.3 that coir matting and natural vegetation would be used for culvert entrances and exits. These changes have not been made in all the drawings either (see comment on drawings).

10. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Attachment A, section 2.6 Pg #: 8 Line #: Code: C
 Original Comment #:
 Comment: Procedures provided in the Sitewide Excavation Plan and WAC Attainment Plan require WAO oversight during excavation to ensure WAC compliance. The text must be revised to define appropriate WAO oversight and monitoring during excavation activities.

11. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Attachment A, section 2.6 Pg #: 8 Line #: Code: C
 Original Comment #:
 Comment: The act of collecting WAC samples does not constitute WAC compliance. Until the data has been provided to Ohio EPA and USEPA for review and approval the area is not WAC compliant. All WAC sampling must be complete and data submitted to agencies prior to the initiation of excavation activities.

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12. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Attachment A, section 2.6 Pg #: 9 Line #: Code: C
Original Comment #:
Comment: Under no previous circumstances has vegetation been free released from the site. Vegetation can be released for reuse through chipping, etc. on-site but no procedure is in place for free -release of vegetation.
13. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Attachment A, section 3.1 Pg #: 6 Line #: Code: C
Original Comment #:
Comment: The second bullet should be changed to state, "*As a minimum*, in dry conditions, dust controls shall be initiated before each work shift and during lunch breaks, *or as necessary to ensure FEMP site-specific limits and OEPA standard for fugitive dust emissions are not exceeded*."
14. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment A, Appendix B Pg #: 1 of 7 Line #: NA
Original Comment #:
Comment: Sheet 1 of 6 is shown in the upper right corner, whereas there are actually 7 pages.
15. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment A, Appendix B Pg #: 3 of 7 Line #: NA Code: C
Original Comment #:
Comment: Bullet 3 under assumptions mentions "potentially contaminated" areas but does not include roads on which "potentially contaminated" materials will be hauled. For the purposes of storm water control, these areas should also be considered "potentially contaminated".
16. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment A, Appendix B Pg #: 7 of 7 Line #: NA Code: C
Original Comment #:
Comment: This states that "...to the sedimentation basins in the southwest corner. These sediment basins have a storage capacity of approximately 50.0 cy to protect an area less than 1 acre..." The drawings do not show these basins. Additionally, the entire area that drains to a sediment basin must be considered in sizing it, not just the disturbed or construction area. Would this basin hold the equivalent of 67 cy per acre of drainage area (unable to tell from the information in this section.)

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17. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment A, Appendix B, Attachment A Pg #: A4 of A21 Line #: SWS-017 of Table 2-9 Code: C
Original Comment #:
Comment: Seeding should conform to the site requirements, which are different than those in Rainwater and Land Development. All else should conform to Rainwater and Land Development.

Drawings

18. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment B, Drawings Pg #: 66FCD001 Code: C
Original Comment #:
Comment: Note 3, drainage area 6 outlet is listed as existing storm water basin north of the K-65 trench. The only existing storm water basin identified on the drawing is south of the K-65 trench. Please clearly identify the storm water basin to which you refer in this note.
19. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment B, Drawings Pg #: 66FCD001 Code: C
Original Comment #:
Comment: There is an existing catch basin in drainage area 3 connected to the 30" RCP line. It appears as though this catch basin could intercept flow from any accidental releases from the project and direct that flow to the Pilot Plant Drainage Ditch without first passing through the storm water basin. This catch basin should be blocked and if drainage is needed in that area, a catch basin tied in to the 12" ST could be added. This will direct all flow to the storm water basin before flowing to the Pilot Plant Drainage Ditch.
20. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment B, Drawings Pg #: 66FCD001 Code: C
Original Comment #:
Comment: The proposed 18" ST that allows storm water to pass under the entry point from the perimeter road to drainage area 3 should be removed. This will allow storm water to flow untreated into the Pilot Plant Drainage Ditch through the existing catch basins west of the entry. By not installing this culvert, storm water can be redirected to the existing storm water basin south of the perimeter road through existing catch basin CB-01.
21. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment B, Drawings Pg #: 66FCD001 Code: C
Original Comment #:

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Comment: The catch basins in the drainage swale on the south side of drainage area 5 should be protected with reinforced silt fence (eg see ODNR Rainwater and Land Development, page 125).

- 22. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment B, Drawings Pg #: 66FCD002 Code: C
Original Comment #:
Comment: Note 3 should be revised to reflect the installation of matting and seeding in these areas (see also dwgs 003, 004 and note 4 in 006).

- 23. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment B, Drawings Pg #: 66FCD002 Code: C
Original Comment #:
Comment: Silt fence installed as inlet protection as in the swale south of drainage area 5 should not be removed, they should be left in place (see also dwgs 003 and 004).

- 24. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment B, Drawings Pg #: 66FCD002 Code: C
Original Comment #:
Comment: The silt fence at the south end of drainage area 3 should be installed on the upper end of the contour and have the ends turned up. If there is a concern of the pool formed behind the silt fence encroaching on the construction area, removing the pooling function of the silt fence is not the direction to take for solving the problem. The concept is to hold the water for as long as practical to allow sediment to settle out. Redirecting flow to a catch basin increases sediment loads carried off the construction area by concentrating flow. It would be better to allow the pool to form behind the silt fence and let the water be removed from the area by flowing through the silt fence. Alternatively, inlet protection could be provided in the swale around catch basin 01. Preferably, the silt fence should be installed to intercept sheet flow prior to flow reaching the swale.

- 25. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment B, Drawings Pg #: 66FCD002 Code: C
Original Comment #:
Comment: The silt fence at the south side of drainage area 5 should be installed as described in the previous comment. Inlet protection should be provided as described above.

- 26. Commenting Organization: Ohio EPA Commentor: DSW

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Section #: Attachment B, Drawings Pg #: 66FCD002 Code: C

Original Comment #:

Comment: The silt fence to the west of drainage area 4, in acting as a diversion to flow, will concentrate flow along the base of the silt fence and at the ends. This frequently causes undercutting in these areas. Frequent inspections of this silt fence will need to be made and actions to correct any erosion taken immediately.

27. Commenting Organization: Ohio EPA Commentor: DSW

Section #: Attachment B, Drawings Pg #: 66FCD003 Code: C

Original Comment #:

Comment: The silt fence at the east side of drainage area 1 should be installed as described in the comment above. As there are no catch basins in this swale, the only alternative to installation along the contour at the edge of the parking area would be installing the silt fence in the swale in long inverted "v" configurations in a north-south direction. However, as described in the above comment, installation along the top of the swale is preferred.

28. Commenting Organization: Ohio EPA Commentor: DSW

Section #: Attachment B, Drawings Pg #: 66FCD006 Code: C

Original Comment #:

Comment: Catch basin protection detail should show reinforcing and installation detail as described in ODNR Rainwater and Land Development page 125.

Technical Specifications

29. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: Spec 02302, 3.2.1 Pg #: Line #: Code: C

Original Comment #:

Comment: The document references several different piling activities. Considering the limited space within the AWR project area and OU4 in general. Piling should be kept to an absolute minimum and must be managed very aggressively. All piles must receive appropriate MTL designations and tracking.

30. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: Spec 02302, 3.2.1 Pg #: Line #: Code: C

Original Comment #:

Comment: Piles with side slopes of 2:1 will certainly present problems in terms of access and stability. Piles of this nature should receive extra scrutiny for proper erosion controls.

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31. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment C, 02302, 3.9.2 Pg #: 02302-11 Code: C
Original Comment #:
Comment: This refers to Section 07924, Seeding and should refer to 02924.
32. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 02370-4, 3.4 Pg #: Line #: Code: C
Original Comment #:
Comment: There is a conflict between paragraph A and C.2 of this section with regard to the % slope requiring the use of matting. Please correct.
33. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 02370-4, 3.4 Pg #: Line #: Code: C
Original Comment #:
Comment: No requirements with regard to the type of erosion matting are provided. See previously approved specifications for other projects and include matting material requirements.
34. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 02370-4, 3.5 Pg #: Line #: Code: C
Original Comment #:
Comment: It should be noted that erosion control matting is to be left in place following the establishment of vegetative cover and the completion of disturbance activities. Removal of the matting will negatively effect the vegetative cover. Erosion control matting should be made of biodegradable materials eliminating the need for removal.
35. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment C, 02530, 3.1.1.1Pg #: 02530-5 Code: C
Original Comment #:
Comment: Crossings should conform to Ohio EPA guidance, specifically, whenever a sanitary sewer and water main must cross, the sewer shall be at such an elevation that the crown of the sewer is at least 18 inches, measured between the outside pipe walls, below the water main. It appears from drawings 51CFD003 and 61CFD002 that this distance exists. This specification, however, should reflect practices deemed acceptable by Ohio EPA. The actual construction should also conform.
36. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 02630-5, 2.5 Pg #: Line #: Code: C
Original Comment #:

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Comment: Previously the document discussed the use of erosion control matting to replace riprap. It is unclear from this specification and the drawings where erosion control matting is being used rather than riprap.

37. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Spec 02924 Pg #: Line #: Code: C
 Original Comment #:
 Comment: Ohio EPA understands the site-wide seeding specification is being revised to change the species planted and the rates. The specification should be revised to incorporate the new seeding spec. Ohio EPA recommends contacting Fluor Fernald's Natural Resources group.
38. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Spec 02924 Pg #: Line #: Code: C
 Original Comment #:
 Comment: The specification as written appears to be an attempt to revised an existing spec to address some issues from previously approved specifications rather than the use of a previously approved spec. Ohio EPA recommends replacing this specification with one previously approved by the agencies. Modifications if required for project specific actions could then be incorporated with higher likelihood of acceptance.
39. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Spec 02924 Pg #: Line #: Code: C
 Original Comment #:
 Comment: Recent use of the product Regreen on-site have been very successful. Ohio EPA recommends use of Regreen rather than perennial rye for temporary seeding.
40. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Spec 02924-5, 2.5 Pg #: Line #: Code: C
 Original Comment #:
 Comment: Previous specs have not gone into nearly as much detail with regard to the properties required of topsoil. This appears to be overly restrictive considering the highly developed nature of the area. Additionally, any off-site topsoil proposed to be brought in for use will need to be evaluated for COCs, etc.
41. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Spec 02924-8, 2.9 Pg #: Line #: Code: C
 Original Comment #:
 Comment: See existing, recently approved specs for appropriate erosion control matting

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requirements. The use of plastic netting is not acceptable.

Attachment D

42. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Attachment D Pg #: 3 Line #: Written comment 9 Code: C
Original Comment #:

Comment: There was an omission in our original comment. The original document submitted to us stated that no Indiana Bat had been observed along the Paddys Run riparian corridor. In fact, during a recent survey conducted by the site, an Indiana Bat was observed in the Paddys Run riparian corridor.