



Department of Energy

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3210



SEP 06 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-0982-00

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 U.S. ENVIRONMENTAL PROTECTION AGENCY
AND OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE REVISED
ON-SITE DISPOSAL FACILITY PHASE III FINAL SUPPORT PLANS, DESIGN CRITERIA
PACKAGE, CALCULATION SECTIONS, AND CERTIFIED FOR CONSTRUCTION
TECHNICAL SPECIFICATIONS**

- References:
- 1) Letter, J. Saric to J. Reising, "OSDF Revised Support Plans," dated July 31, 2000
 - 2) Letter, T. Schneider to J. Reising, "Comments OSDF Phase III CFC Packages," dated August 3, 2000
 - 3) Letter, T. Schneider to J. Reising, "Additional Comment OSDF Phase III CFC Plans," dated August 10, 2000

Enclosed for your approval are responses to the U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) comments on the revised On-Site Disposal Facility (OSDF) Phase III Final Support Plans, Design Criteria Package, Calculation Sections, and Certified for Construction Technical Specifications. Upon the U.S. EPA and OEPA approval, these comment responses will be incorporated into the subject documents. The responses to the OEPA specification comments, however, will be immediately incorporated into Design Change Notices (DCN) so that restoration of the completed portion of Borrow Subarea 1 can be expeditiously performed.

Mr. James A. Saric
Mr. Tom Schneider

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If you have any questions regarding this document or need further information, please contact Jay Jalovec at (513) 648-3122.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Jalovec

Enclosure

cc w/enclosure:

R. J. Janke, OH/FEMP
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. Hodge, Tetra Tech
AR Coordinator, Fluor Fernald, Inc./78

cc w/o enclosure:

N. Hallein, EM-31/CLOV
J. Jalovec, OH/FEMP
A. Tanner, OH/FEMP
D. Carr, Fluor Fernald, Inc./2
J. Chiou, Fluor Fernald, Inc./52-0
T. Hagen, Fluor Fernald, Inc./65-2
J. Harmon, Fluor Fernald, Inc./90
S. Hinnefeld, Fluor Fernald, Inc./31
M. Jewett, Fluor Fernald, Inc./52-2
U. Kumthekar, Fluor Fernald, Inc./65
T. Walsh, Fluor Fernald, Inc./65-2
S. Wolinsky, Fluor Fernald, Inc./64
ECDC, Fluor Fernald, Inc./52

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY TECHNICAL REVIEW
COMMENTS ON THE
REVISED ON-SITE DISPOSAL FACILITY SUPPORT PLANS,
DESIGN CRITERIA PACKAGE, AND CALCULATION SECTIONS

(20100-PL-0002, REVISION 1D,
20100-PL-0004, REVISION 1D
20100-PL-0006, REVISION 1D
20100-PL-0007, REVISION 2C
20100-DC-0001, REVISION 1C
20103-CA-0001, REVISION 1A
20103-CA-0002, REVISION 1A)

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

IMPACTED MATERIALS PLACEMENT PLAN

Commenting Organization: U.S. EPA Commentor: Saric

Section #: 4.4 Page #: 4-5 Line #: Not Applicable (NA)

Original Specific Comment #: 2

Comment: The text indicates that used oils are no longer an item specifically prohibited from being disposed of in the On-Site Disposal Facility (OSDF). It is unclear why used oils are no longer prohibited from disposal at the OSDF. The text should be revised to clarify this matter.

Response: "Used Oils" was inadvertently deleted from the list of prohibited items.

Action: Restore "Used Oils" to the prohibited items list.

CONSTRUCTION QUALITY ASSURANCE PLAN

Commenting Organization: U.S. EPA Commentor: Saric

Section #: 7 through 9 Page #: NA Line #: NA

Original Specific Comment #: 3

Comment: The text states that inspection and testing at the manufacturing plant will be required for the geosynthetic clay liner and geomembrane liner. However, inspection and testing at the manufacturing plant are not mentioned for geotextiles. The text should be revised to include inspection and testing at the manufacturing plant for geotextiles.

Response: Manufacturer quality control testing of geotextile will be conducted by the Manufacturer as part of the geotextile submittal process. In addition, samples will be obtained from the Manufacturing plant by the CQC Consultant for conformance testing and approved prior to material shipment to the site. A manufacturing plant visit by Fluor Fernald, Inc. and the CQC Consultant may be conducted if there are concerns on the Manufacturer's quality control procedures during the submittal process.

Action: Add the following new section 9.3, "Manufacturing Plant Visit" and adjust numbers of the proceeding sections accordingly: "Manufacturer quality control testing of geotextile will be conducted by the Manufacturer as part of the geotextile submittal process. In addition, samples will be obtained from the Manufacturing plant by the CQC Consultant for conformance testing and approved prior to material shipment to the site. A manufacturing plant visit by Fluor Fernald, Inc. and the CQC Consultant may be conducted if there are concerns on the Manufacturer's quality control procedures during the submittal process."

Section 4.2.1 of the Surface Water Management and Erosion Control (SWMEC) Plan will be revised to insert the following sentence immediately after the first sentence in this section: "Interim vegetation will be applied to disturbed areas not receiving crusting agents which are scheduled to be disturbed again within 5 years."

Section 4.4.1 of the SWMEC Plan will be revised to insert the following sentence immediately after the first sentence in this section: "Permanent vegetation will be applied to disturbed areas which are not scheduled to be disturbed again for a period of at least 5 years."

Commenting Organization: Ohio EPA
Section #: Spec. 02930, Section 3.02(F) Pg. #: Line #:
Original Comment #: 6

Commentator: OFFO
Code: C

Comment: Ohio EPA does not believe 2H:1V is an acceptable permanent slope. Slopes of this nature should be regraded to provide a more stable profile. Additionally, based upon previous attempts at seeding on the site, Ohio EPA recommends requiring the use of erosion mat on slopes of 4H:1V as well.

Response: **Agree. Permanent slopes will not exceed 3H:1V. Erosion mats will be used on permanent slopes of 4H:1V or steeper.**

Action: **Revise section 3.02(F) to read as follows: "Stabilization of permanent slopes between 3H:1V and 4H:1V (horizontal to vertical) shall utilize an erosion mat as specified in Section 2270 after application of seed mixture."**

Commenting Organization: Ohio EPA
Section #: Spec. 02930, Section 3.03(B) Pg. #: Line #:
Original Comment #: 7

Commentator: OFFO
Code: C

Comment: July 1 would seem to be too late to successfully conduct permanent seeding. Ohio EPA would recommend moving the end of the permanent seeding window back to June 1.

Response: **Generally agree. The seeding window for permanent seeding will be revised to June 15. This will allow for delayed planting during a wet spring and will also accommodate soil temperature requirements of warm season grasses (50°F).**

Action: **July 1 will be deleted and replaced with June 15.**

Commenting Organization: Ohio EPA
Section #: Spec. 02930, Table 02930-1A Pg. #: Line #:
Original Comment #: 8

Commentator: OFFO
Code: C

Comment: Please include scientific names of all species in the seed mix to prevent any confusion during ordering or QC checks.

Response: **Agree.**

Action: **Text will be revised to include scientific names of all plant species.**

Commenting Organization: Ohio EPA
 Section #: Spec. 02930, Table 02930-1BPg. #: Line #: Commentator: OFFO
 Original Comment #: 9 Code: C
 Comment: Please include scientific names of all species in the seed mix to prevent any confusion during ordering or QC checks.

Response: **Agree.**

Action: Text will be revised to include scientific names of all plant species.

Commenting Organization: Ohio EPA
 Section #: Spec. 02930, Table 02930-2 Pg. #: Line #: Commentator: OFFO
 Original Comment #: 10 Code: C
 Comment: Ohio EPA recommends the elimination of annual rye grass from the spec to reduce impact on any future restoration effort. Increasing the use of Canada Wild Rye (*Elymus canadensis*) is an appropriate replacement. Additionally, the spec should be revised to include Partridge Pea (*Cassia fasciculata*). This legume is generally recommended for planting with ReGreen as seen in the STP planting. Please include scientific names of all species in the seed mix to prevent any confusion during ordering or QC checks.

Response: **Agree. The seed mix for interim vegetation will be revised to replace the 20 pounds per acre of Annual Rye with 20 additional pounds per acre of Canada Wild Rye. Also, 10 pounds per acre of Partridge Pea will be added to this mix.**

Action: Table 02930-2 will be revised with the changes indicated in the response above and scientific names will accompany common names.

Commenting Organization: Ohio EPA
 Section #: Spec. 02270, Section 2.02 Pg. #: Line #: Commentator: OFFO
 Original Comment #: 11 Code: C
 Comment: Ohio EPA recommends deletion of the use of Excelsior or Curlex and replacement with coir matting. The Excelsior type matting has presented several problems at previous on-site projects. Problems generated from the failure of the netting to biodegrade resulting in tripping hazards, maintenance problems and animal trapping. Additionally, the matting can inhibit vegetation due to the lack of space for vegetation to grow through the mat thus resulting in the mat pillowing up over the vegetation. In all previous on-site uses of coir matting, acceptable vegetation cover has quickly established. This results from the open spacing of the matting allowing vegetation to grow through, while retaining the structural integrity to stabilize the soil and hold moisture.

Response: **Agree. Excelsior and Curlex erosion mats for permanent or temporary slopes were selected based on their successful use at other sites; however coir matting, or an approved equal, will be used at the OSDF based on discussions with OEPA.**

For areas containing very low energy flows that may be disturbed within 2 years, it was agreed with OEPA that a material with biodegradable netting

and/or sufficient spacing to allow emergence of vegetation would be considered.

Action: Sections 2.02 and 3.01(B) will be revised in accordance with the preceding response.