



State of Ohio Environmental Protection Agency

3757

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June 27, 2001

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

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**RE: COMMENTS - IMPLEMENTATION PLAN FOR A2P1 NON-WASTE UNITS**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's May 25, 2001 submittal, "Transmittal of the Draft Integrated Remedial Design Package for Area 2, Phase1 Non-Waste Units Perimeter Area." Attached are Ohio EPA comments on the document.

Should 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, Fluor Fernald  
Mark Shupe, GeoTrans, Inc.  
Francie Hodge, Tetra Tech EM Inc.  
Ruth Vandergrift, ODH

**OHIO EPA COMMENTS ON  
IMPLEMENTATION PLAN FOR A2P1 NON-WASTE UNITS PERIMETER AREAS**

- 1) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: General Pg #: Line #:                      Code: C  
Original Comment #:  
Comment: The document fails to include dates for start and/or completion of the work proposed within the implementation plan. The document should be revised to include a schedule for the proposed work. The lack of a schedule has lead to significant confusion during the review regarding when which components will be completed. Additionally, the development of a certification schedule and draft Cert PSP will allow for efficient implementation of certification and restoration activities immediately following remediation.
  
- 2) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: General Pg #: Line #: Code: C  
Original Comment #:  
Comment: Please clarify the following. The Non-Impacted Material Stockpile (NIMS) and the Turnaround are names which were used interchangeably throughout the document to describe areas/stockpiles located in the middle of the "turnaround" or gravel road in the SWU.. Please make the text clear as to whether it is the same area or two different remediation areas. In addition, please do the same regarding the description list for the remediation areas.
  
- 3) Commenting Organization: Ohio EPA                      Commentor: DSW  
Section #: 1.3.3.1 Pg #: 1-6 Line #: 2-5 Code: C  
Original Comment #:  
Comment: The Indiana Bat has recently been captured in the Paddys Run corridor on site. This section should be revised to address this and what measures will be taken to preserve/enhance habitat for the Indiana Bat.
  
- 4) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 1.3.3.3 Pg #: 1-6 Line #: Code: C  
Original Comment #:  
Comment: Considering this project will be closely tied with restoration of the area and that the work is occurring within a sensitive riparian/floodplain habitat, construction activities should be closely coordinated with the Fluor Natural Resources group and the Natural Resource Trustees.
  
- 5) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 1.4 Pg #: 1-8 Line #: 1-6 Code: C  
Original Comment #:  
Comment: The restoration portion of the project should be completed as soon after completion of remediation as possible and to the greatest possible extent be coordinated with the remediation to optimize usage of funds.

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- 6) Commenting Organization: Ohio EPA Commentor: DSW/OFFO  
 Section #: Figure 1-2 Pg #: Line #: Fig 1-2 Code: C  
 Original Comment #:  
 Comment: The Perimeter Area delineation includes/excludes some areas the reasons for which are not clear. For example, Basin 3 is included in the footprint of the Perimeter Area, however basin has already had the geomembrane removed and has been excavated, however the area south and west of basin 3, which had what appeared to be fly ash present during installation of components, is not included in the footprint. Also included is a narrow section designated A2P2 Part 1 (on Figure 1-2) that drains from the wheel wash facility to the ditch south of the SWRB, and it is unclear as to why this is part of the Perimeter Area footprint. The area that had geomembrane to the northwest of the construction support area is not included in the footprint. A small portion of between the Carolina Area and the Turnaround Pile is also excluded from the area. Please define further the rationale for the Perimeter Area delineation including the above, as well as define the Areas that will address all non-selected portions.
- 7) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 2.1.2.1 Pg #: 2-2 Line #: Code: C  
 Original Comment #:  
 Comment: The hotspot criteria was developed for certification areas not as part of pre-design investigations. If an area of contamination above the FRL is determined from pre-design scanning then supplement characterization by physical sampling is necessary, followed by excavation of any above FRL materials. These areas which exceed the FRL require remediation. The document should be revised to incorporate excavation of these areas.
- 8) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 2.2 Pg #: 2-3 Line #:23 Code: C  
 Original Comment #:  
 Comment: Be has been detected above the FRL and is known to be associated with flyash. Be must be kept as an ASCOC. The text states "no above-FRL concentrations of any secondary COCs were detected in the Perimeter Area during predesign." Were any secondary COCs even sampled for? The appendix includes no data other than that of primary radionuclide COCs. If no sampling for secondary COCs was conducted, this misleading sentence must be removed from the text. If sampling was conducted, include the results.
- 9) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 2.3.2 Pg #: 2-4 Line #:10-11 Code: C  
 Original Comment #:  
 Comment: This section states that portions of Retention Basin 1 and lines from Well House 13 will be removed. What exactly will be removed, and when will the remaining portions be removed?

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Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: 3.4            Pg #: 3-3            Line #: 33-34            Code: C  
 Original Comment #:

Comment: In the list for general excavation, two bullets state that removal will be done "by others." Please explain who are the "others" being referred to in text.

10) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: 3.4            Pg #: 3-4            Line #: 5-6            Code: C  
 Original Comment #:

Comment: The West Seepage Station is not identified on Figure 1-3. Please clarify the location of this station.

Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: 3.4.1            Pg #: 3-6            Line #: 1-6            Code: C  
 Original Comment #:

Comment: The NIMS No. 1 is gone so it shouldn't account for anything in this design. Additionally, Ohio EPA believes some liner/fill will be necessary in Basin 2 to prevent direct loading of any spills/contaminated run-off directly into the aquifer. This was our basis for allowing installation of the geosynthetic liner within Basin 2 to expedite protection of the aquifer. Consistent with that approach it is likely that some fill will be necessary to slow infiltration to the aquifer.

11) Commenting Organization: Ohio EPA                      Commentor: DSW  
 Section #: 3.4.3            Pg #: 3-7            Line #: 7-11            Code: C  
 Original Comment #:

Comment: During the remediation of the Carolina area, buried debris was removed that extended under the road by basin 2. The debris was not removed under the roadbed. The 6 inch scrape and utility chase will not address the removal of this debris.

12) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: 3.4.4            Pg #: 3-7            Line #: 20-22            Code: C  
 Original Comment #:

Comment: Actions to be taken following the 6" scrape are not explicitly stated. Ohio EPA expects that visual observation will drive any additional excavation in association with real time scans off all areas.

13) Commenting Organization: Ohio EPA                      Commentor: DSW  
 Section #: 3.4.4            Pg #: 3-9            Line #: 1-4            Code: C  
 Original Comment #:

Comment: It is unclear how the addition of a berm at ditch 7/basin 2 will raise the level of basin 2 without impeding flow from the upgradient areas into basin 2. It would seem prudent to

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allow free flow into basin 2 and any overflow to back into the excavated ditch 7 area rather than construct a berm. The drawing of the final grading of this area does not show a berm but free flow into and out of the west end of basin 2. This is preferable to installation of a berm. Please provide additional information about this (drawings with surface water flow and more detailed narrative).

- 14) Commenting Organization: Ohio EPA Commentor: DSW  
 Section #: 3.4.5 Pg #: 3-9 Line #: 29-30 Code: C  
 Original Comment #:  
 Comment: Please provide more detail on the grading. Rather than "grade to drain", it is preferred to retain some water retaining capacity to create a shallow pool, referred to as a vernal pool. It is recommended that the site Natural Resources group be consulted for grading recommendations here.
- 15) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.4.7 Pg #: 3-11 Line #: 1-4 Code: C  
 Original Comment #:  
 Comment: Actions to be taken following the 6" scrape are not explicitly stated. Ohio EPA expects that visual observation will drive any additional excavation in association with real time scans off all areas.
- 16) Commenting Organization: Ohio EPA Commentor: DSW  
 Section #: Drwg 92X-5500-X-02030 Pg #:NA Line #: EWF Code: C  
 Original Comment #:  
 Comment: Please provide more detail on the installation and use of silt fence. Silt fence is not shown on drawing 92X-5500-G-02033, nor is direction of surface water flow. The reason for installation of silt fence along ditch 14 is not clear. If it is to prevent run on, then a berm is preferable as the use of a silt fence to direct flow can cause undercutting of the silt fence through erosion at the base of the silt fence.
- 17) Commenting Organization: Ohio EPA Commentor: DSW  
 Section #: Drwg 92X-5500-X-02030 Pg #:NA Line #: Basin 4 Code: C  
 Original Comment #:  
 Comment: Please provide more detail on the installation and use of silt fence. Silt fence is not shown on drawing 92X-5500-G-02027, nor is direction of surface water flow. The reason for installation of silt fence around basin 4 is not clear without showing surface water flow. If it is to prevent run on, then a berm is preferable as the use of a silt fence to direct flow can cause undercutting of the silt fence through erosion at the base of the silt fence.
- 18) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: Drwg 92X-5500-X-02033 Pg #:NA Line #: Code: C

Original Comment #:

Comment: The drawing appears to show the transfer line for water from the Basins to the Stormwater Retention Basins as being left in place. This line should be removed following the removal of Basin 2. Due to the amount of items on the drawings and confusion of the proposed sequencing of work, an additional drawing showing just utilities/piping/features proposed to be left following completion of the project should be included.

- 19) Commenting Organization: Ohio EPA Commentor: DSW/OFFO  
Section #: Technical Specifications Package Pg #: NA Line #: NA Code: C  
Original Comment #:

Comment: This package does not contain 02270 which is referenced in the drawings (e.g. 92X-5500-X-02030). The package should include the most recent seeding and erosion control specifications. Specifically those specs requiring the use of matting on slopes and the seeding mixes for wet and upland areas.

- 20) Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: Technical Specifications 02205 Package Pg #: 4 Line #: NA Code: C  
Original Comment #:

Comment: Ohio EPA does not concur with DOE's assertion that the riprap located in Paddys Run from the original removal action is non-impacted. The riprap was installed due to waste materials falling into Paddys Run. The soil behind the riprap was not certified prior to installation and no geofabric was installed. Therefore we believe at a minimum the first layer of riprap which is in direct contact with soil should be dispositioned as impacted. And a field call depending on the penetration of soils and waste materials in the area should be used to determine the disposition of the rest of the materials. Without this type of disposition approach sampling will be necessary to determine the material is non-impacted.