



State of Ohio Environmental Protection Agency

4488

Southwest District Office

FERNALD
LOG C-01917

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6404

Bob Taft, Governor
Maurice O'Connor, Lt. Governor
Christopher Jones, Director

2002 SEP 20 A 10:41

September 19, 2002

FILE: _____

LIBRARY: _____

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

RE: CFC PACKAGE FOR SOUTH FIELD PHASE II MODULE INFRASTRUCTURE

Dear Mr. Reising:

This letter provides Ohio Environmental Protection Agency comments on the Certified for Construction Package for the South Field Phase II Ground Water Remediation Module Infrastructure.

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

Sincerely,

for

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.
Michelle Cullerton, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

**Ohio Environmental Protection Agency Comments on the CFC Package for the
South Field Phase II Ground Water Remediation Module Infrastructure**

1. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Drawings 95X-5500-G-02067, 02068, 02069, 02070 Code: C
Comment: Each of these drawings have silt fence depicted but none show land contours, surface water flow, etc. To properly evaluate silt fence installation, at the very minimum, contours must be shown. Please see Rainwater and Land Development, page 118, the left side of figure 4-5.

2. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Drawing 95X-5500-G-02075 and Tech Spec 02270
Pg #: 3 Line #: 2.1A Code: C
Comment: This drawing specifies a stake for the silt fence at 4'6" and the specification requires a minimum 2'8" in height. Although the specification states "minimum" this is a very large difference from the drawing. The drawing and the specification should be similar in the requirement.

3. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Drawing 95X-5500-G-02070 and Tech Spec 02270 Pg #: 4 and 5 Line #: 3.1A.4
Code: C
Comment: Care should be taken during pipeline installation to minimize damage to restored/planted areas. For example, although difficult to tell due to lack of detail, it appears as though the pipeline and/or silt fence trenching in the above-referenced drawing may encroach on a recently planted area. It may be preferable to forego silt fence installation in this area and not damage the recent plantings. There would be more to gain by this action than adding another trenching operation (to install silt fence). Additional language could be added to section 3.1.A.4, and more detail to Drawing 95X-5500-G-02070.

4. Commenting Organization: Ohio EPA Commentor: DSW
Section #: General Pg #: NA Line #: NA Code: DSW
Comment: There is a general tendency for access to wells on site to be insensitive to the environment. Although this document demonstrates an improvement (e.g. drawing 95X-5500-G-02069, field adjust road to save trees), each of these wells specifies the construction of a new gravel access road. We would like to see a justification for the construction of all these access roads and an attempt at making the roads more environmentally friendly if they are necessary.