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State of Ohio Environmental Protection Agency

Southwest District Office

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2002 SEP 25 A 10:30

September 24, 2002

FILE: _____

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

RE: COMMENTS ON OSDF SEDIMENTATION BASIN # 2 DCN

Dear Mr. Reising:

This letter provides Ohio Environmental Protection Agency comments on the DCN for the Addition of Sedimentation Basin #2 to the Phase IV Scope of Work.

The footprint of OSDF Sediment Basin 2 is located in Area 5 and is referred to as Area 5 Administrative Eastern Field (A5A-EF). This area has not been certified as meeting FRLs and is bounded on the east by certified areas in Area 1 Phase II. Responses to these comments should detail the sequence of remedial activities, sampling and certification which will be conducting prior to the construction of Sediment Basin 2. Of particular interest is a management plan to ensure that contaminated soils are not placed in certified areas.

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

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**Ohio Environmental Protection Agency Comments on the
OSDF Sedimentation Basin #2 DCN**

1. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Drawing 90X-5000-G-00367 Pg #: NA Line #: NA Code: C
Comment: The outlet structure should be located as far away from the inlet as possible. This allows maximum time for sediment to settle out. It should be moved either to the south end of the basin or to the south of the power pole peninsula.

2. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 90X-5000-G-00404 Pg #: NA Line #: NA Code: C
Comment: The sediment dewatering orifice does not comply with ODNR Rainwater and Land Development specifications (pp 98-110). In dewatering option 2, 100% drawdown, the perforated riser must be wrapped with wire mesh and double wrapped with porous geotextile (e.g. silt fence). Please change dewatering to comply with options in ODNR Rainwater and Land Development.

3. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 90X-5000-G-00404 Pg #: NA Line #: Note 10 Code: C
Comment: Specification 02930 was not included in the package. This should be similar to the specification 02900 included in the CFC for South Field Phase II Groundwater Infrastructure (drawing) package (dated 8/29/02) which includes a dry area permanent seed mix (Table 02900-1A), a wet area permanent seed mix (Table 02900-1B), and a mix for interim vegetation (Table 02900-2). Specification packages 02714 and 02271 referenced in the drawing were also missing from the package.

4. Commenting Organization: Ohio EPA Commentor: DSW
Section #: ES Conclusions Pg #: 2 of 282 Line #: New Channels Code: C
Comment: Note that channels with velocities exceeding 3 fps should have rock check dams properly installed.

5. Commenting Organization: Ohio EPA Commentor: DSW
Section #: ES Conclusions Pg #: 3 of 282 Line #: OSDF Sedimentation Basin 2
Code: C
Comment: The first bullet describes the disturbed upstream drainage area as what was used for the calculation. The entire drainage area needs to be used, not just the disturbed area (see Section 2.8.3B, page 2-81, page 32/282, and Section 2.10.2.4B, page 2-103, page 47/282 in this document and as indicated in ODNR Rainwater and Land Development).

6. Commenting Organization: Ohio EPA Commentor: DSW
Section #: West OSDF Design Scenarios Pg #: 8 of 282 Line #: NA Code: C
Comment: The design here and in attachment A-2 shows only the cells as being part of the drainage area. The entire drainage area needs to be used, not just the disturbed area (see Section 2.8.3B, page 2-81, page 32/282, and Section 2.10.2.4B, page 2-103, page 47/282 in this document and as indicated in ODNR Rainwater and Land Development).

Ohio EPA Comments
OSDF Sediment Basin #2 DCN
Page 2

7. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Sedimentation Basins Pg #: 19 of 282 Line #: OSDF Sed Basin 2 Code: C
Original Comment #:
Comment: The last sentence on this page states that the total drainage is used in place of disturbed upstream drainage, however the calculations and drawings for the west drainage do not reflect this. The entire drainage area needs to be used, not just the disturbed area (see Section 2.8.3B, page 2-81, page 32/282, and Section 2.10.2.4B, page 2-103, page 47/282 in this document and as indicated in ODNR Rainwater and Land Development).
8. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 2.8.1 Pg #: 2-75, 26 of 282 Line #: NA Code: C
Comment: The bullets do not include runoff from areas that are not disturbed, for which surface water treatment must be sized to include, should that runoff be in the drainage area of the treatment system (see Section 2.8.3B, page 2-81, page 32/282, and Section 2.10.2.4B, page 2-103, page 47/282 in this document and as indicated in ODNR Rainwater and Land Development).
9. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 2.8.3A Pg #: 2-77, 28 of 282 Line #: NA Code: C
Comment: Outlet structures should comply with the design guidelines from ODNR Rainwater and Land Development
10. Commenting Organization: Ohio EPA Commentor: DSW
Section #: NA Pg #: 2-102, 46 of 282 Line #: NA Code: E
Comment: This page didn't make it through the copier and only the right half of the page was in the package. It appears as though there may be criteria for the amount of time to discharge a pond's volume in this section. Note that, using dewatering option 1 in ODNR Rainwater and Land Development, the pond should dewater 60% of its volume in 48 to 72 hours.