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State of Ohio Environmental Protection Agency

Southwest District Office

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November 11, 2003

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

RE: APPROVAL TO PLACE IMPACTED MATERIAL IN OSDF CELL 6

Dear Mr. Griffiths:

This letter provides Ohio Environmental Protection Agency approval to place impacted material in Cell 6 of the On-Site Disposal Facility as requested in your letter DOE-0022-04. We concur that the primary geomembrane liner is free from measurable defects as reported by Leak Locator Services, Inc. in a letter dated October 28, 2003 to Fluor Fernald, Inc. We also conclude that the extrusion welds that were made with the questionable welding rods are of sufficient strength and quality to function satisfactorily under the static loads that the primary gml is subjected to during the placement of impacted material.

The extruded seams made with the suspect welding rods were mechanically strong enough to meet the project specifications. However, the failure mode of the destructive tests did not meet the project requirements; the test pieces broke within the bead of the weld and not within the original gml panel. Furthermore, the seams were tested both by the vacuum box method and the water puddle electrical method and the primary liner was found to be free from leaks. We considered short-term risks to the liner (i.e. damage during the placing and spreading of the primary drainage layer) to be of greater concern than long-term risks (damage occurring under the static loading of a partially-filled cell).

Should you have any questions, please contact Michelle Waller or me.

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.

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