



State of Ohio Environmental Protection Agency

5565

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

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

LIBRARY: _____
2004 JUL 15 P 1:01
J. Bradley, Governor
Christopher Jones, Director

July 13, 2004

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

**RE: DISAPPROVAL -AREA 9, PHASE III ABANDONED OUTFALL LINE EXCAVATION
PLAN PART ONE**

Dear Mr. Taylor:

Ohio EPA has reviewed DOE's submittal on the, "Area 9, Phase III Abandoned Outfall Line Excavation Plan Part One Rev A Draft (21120-PL-0002)" received on June 22, 2004. Although a thorough review of the document was not possible as the document is incomplete due to lack of predesign sampling data, enclosed are some of Ohio EPA's comments.

Should you have any questions, please contact Donna Bohannon, 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

/

Mr. Taylor
 July 13, 2004
 Page 3

excavation site back to the AWWT. Ohio EPA's assumption is transportation will take place by truck with the water contained in a large tote. Please clarify.

12. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.2.6 Pg. #: 3-5 Line #: 33-35 Code: C
 Comment: Include a drawing/figure detailing how trucks will be clean dumping in the OMTA.

13. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.2.6 Pg. #: 3-5 Line #: Code: C
 Comment: Include a map/figure detailing the haul path and unloading method for AWAC material.

14. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.2.6.2 Pg. #: 3-6 Line #: 27-30 Code: C
 Comment: It is unclear why, when DOE knows that a cover will need to be constructed, that the Mid Valley Pipeline Company has not been consulted for details on the protective cover. Please included details on the cover that will be built.

15. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.2.6.2 Pg. #: 3-7 Line #: Code: C
 Comment: Stockpiling this material prior to completing the ramp would appear to present many potential problems. The approach should be revised to find a method for removing the material as generated, especially with regard to the pipe and bedding.

16. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.2.8 Pg. #: 3-8 Line #: 4-6 Code: C
 Comment: As stated in Ohio EPA's "general" comment above, the results of the residue sampling should have been included in this excavation plan for this document to be adequate. Please include the results.

17. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.3.2 Pg. #: 3-8 Line #: 26-30 Code: C
 Comment: This section on managing stockpiles does not provide any information on how the stockpiles will be managed, such as the discussion on erosion controls are referenced to its appropriate section. Please clarify this within this document or include a reference to the appropriate section in the Tech Specs to provide the reader with accurate information.

Mr. Taylor
 July 13, 2004
 Page 4

18. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.3.4 Pg. #: 3-9 Line #: 9-13 Code: C
 Comment: This paragraph states that the lead from the pipe joints will be "removed and segregated," but it does not explain where the lead material will be disposed. Please include this information in this plan. Also, if the pipe joints are exposed when excavated, the lead should be easily removed in the field.

19. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.3.4 Pg. #: 3-9 Line #: 25-27 Code: C
 Comment: This section states that the pipe will be broken up in either the trench or size reduced at the MTA. OEPA feels that it is much more appropriate for the majority of the size reduction to take place onsite in the MTA, versus breaking up the pipe in the trench and possibly spreading above FRL contamination.

20. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.3.4 Pg. #: 3-10 Line #: 4-8 Code: C
 Comment: This section, as the second paragraph under section 3.2.6 states, should reference all trucks using automatic load covers. Please correct.

21. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.3.7.1 Pg. #: 3-11 Line #: 10-14 Code: C
 Comment: There is no reference to or measurements shown that will be used for slope stability in this paragraph. Please include the safety requirements for slope stability.

22. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3. 3.7.1 Pg. #: 3-11 Line #: 18-21 Code: C
 Comment: See comment # 18.

23. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.3.8 Pg. #: 3-12 Line #: 3-4 Code: C
 Comment: This section mentions the possibility of "surface discharge." Ohio EPA does not accept surface discharging of the water an option. The water either needs to be taken back to the site for discharge or pumped to the active outfall line if approved by Ohio EPA DSW. Please correct.

24. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.3.9 Pg. #: 3-13, 14 Line #: Code: C
 Comment: It appears from the plan that only a very small segment of the pipe (55 inches of 100 feet of piping) will be checked for contamination, both internally and externally, before declaring that the pipe can be free released. This is not acceptable. Full characterization of the pipe length is necessary before OEPA will agree to leave this pipe

