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2-408.10

CONDITIONAL APPROVAL OU2 BORROW AREA WORK PLAN

08/30/95

OEPA DOE-FN
3
COMMENTS



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich
Governor

August 30, 1995

RE: DOE FEMP
MSL 531-0297
HAMILTON COUNTY
CONDITIONAL APPROVAL
OU2 BORROW AREA WORK
PLAN

Mr. Jack Craig
Project Manager
US DOE FEMP
P. O. Box 398705
Cincinnati, OH 45239-8705

Dear Mr. Craig:

This letter provides conditional approval of DOE's Draft Geotechnical Sampling and Testing Plan for On-Site Clay Borrow Areas, Off-Site Material Sources and Operable Unit 2 Waste Units received by the Ohio EPA on July 26, 1995. The condition for approval is satisfactory resolution of the attached comments. If you have any questions, please contact Tim Hull (513)285-6075 or Mike Proffitt (513)-285-6603.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

- cc: Jim Saric, U.S. EPA
- Terry Hagen, FERMCO
- Ruth Vandergrift, ODH
- Mike Proffitt, DD&GW
- Sharon McClellan, PRC
Manager, TPSS/DERR, CO
- Lisa August, GeoTrans

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Ohio EPA Comments on the Draft Geotechnical Sampling and Testing Plan for the On-site Clay Borrow Area, Off-site Material Sources and OU2 Waste Units

- 1) Commenting Organization: Ohio EPA Commentor: DSIWM
General: The only problem identified by DSIWM that may hinder future operations is the gravel content and field permeability in relation to the construction of a clay liner system. The lab testing outlined in the report is acceptable.
Response:
Action:

- 2.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.2 Pg #: 1-7 Line #: 23-24 Code: C
Original Comment #:
Comment: Please include a brief description in this section as to how the clay located under the Inactive Flyash Pile would be excavated, (i.e. post disposal of the flyash pile, temporarily move flyash pile?).
Response:
Action:

- 3) Commenting Organization: Ohio EPA Commentor: DDAGW
Section #: 2.0 Pg #: 2-12 Line #: Code:
Original Comment #:
Comment: There is no mention of Tc⁹⁹ in this section. Are the concentrations of Tc⁹⁹ below levels which could potentially impact ground water quality?
Response:
Action:

- 4) Commenting Organization: Ohio EPA Commentor: DDAGW
Section #: 2.0 Pg #: 2-19 Line #: Code:
Original Comment #:
Comment: Where are the isoconcentration contours in figure 2-6?
Response:
Action:

- 5.) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.5 Pg #: 5-3 Line #: 20-24 Code: C
Original Comment #:
Comment: Changes in scope to an approved workplan should be related to both regulatory agencies either via telephone, fax or letter. By informing the regulatory agencies of such changes, potential conflicts which may result can be avoided. Please include a sentence within the text which discusses this concern.
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Response:
Action:

6.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 7.3.4 Pg #: 7-32 Line #: 17-23 Code: C

Original Comment #:

Comment: Please explain in further detail the rationale for storing drummed cuttings in a near surface pit vs. storage on a concrete pad at the facility.

Response:
Action: