

RESPONSE TO COMMENTS ON THE DRAFT GEOTECHNICAL SAMPLING AND TESTING PLAN FOR ON-SITE CLAY BORROW AREAS, OFF-SITE MATERIALS SOURCES AND OPERABLE UNIT 2 WASTE UNITS

10/02/95

DOE-1589-95
DOE-FN EPAS
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RESPONSES



Department of Energy
Fernald Environmental Management Project
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OCT 02 1995

DOE-1589-95

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Schneider:

RESPONSE TO COMMENTS ON THE DRAFT GEOTECHNICAL SAMPLING AND TESTING PLAN FOR ON-SITE CLAY BORROW AREAS, OFF-SITE MATERIAL SOURCES, AND OPERABLE UNIT 2 WASTE UNITS

The Department of Energy, Fernald Area Office (DOE-FN) is pleased to submit the enclosed Response to the Ohio Environmental Protection Agency (OEPA) comments on the Draft Geotechnical Sampling and Testing Plan (GSTP) for On-Site Borrow Areas, Off-Site Material Sources, and Operable Unit 2 Waste Units.

Upon receiving the OEPA approval on this response, the DOE-FN will modify and issue the final version of the referenced GSTP for both the OEPA and the U. S. Environmental Protection Agency distribution.

If you have any questions, please contact Rod Warner at (513) 648-3156.

Sincerely,

A handwritten signature in black ink that reads "Johnny W. Reising".

Johnny W. Reising
Fernald Remedial Action
Project Manager

FN:Jalovec

Enclosure: As Stated

cc w/enc:

- K. H. Chaney, EM-423/GTN
- M. C. McCune, EM-423/GTN
- B. Skokan, EM-423/GTN
- G. Jablonowski, USEPA-V, 5HRE-8J
- J. Saric, USEPA-V, 5HRE-8J
- Manager, TSP/DERR, OEPA-Columbus
- F. Bell, ATSDR
- D. S. Ward, GeoTrans
- R. Vandergrift, ODOH
- S. McClellan, PRC
- R. Warner, DOE-FN
- G. Becker, FERMCO/45
- R. D. George, FERMCO/52-2
- T. Hagen, FERMCO/65-2
- N. Weatherup, FERMCO/52-2
- AR Coordinator, FERMCO

cc w/o enc:

- L. Parsons, DOE-FN
- C. Little, FERMCO
- P. Norman, FERMCO/52-2
- M. Yates, FERMCO

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**RESPONSE TO OHIO EPA COMMENTS
ON THE DRAFT GEOTECHNICAL SAMPLING AND
TESTING PLAN (GSTP) FOR ON-SITE CLAY BORROW AREAS,
OFF-SITE MATERIAL SOURCES AND OPERABLE UNIT 2 WASTE UNITS**

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GENERAL COMMENTS

Comment No. 1

Commenting Organization: Ohio EPA Commentor: DSIWM
 Section #: N/A Page #: N/A Line #: N/A Code: N/A

Original General Comment: 1

Comment: 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: During the design process, a test pad is planned to be constructed and evaluated in accordance with OAC 3745-27-08 to demonstrate that the materials and compaction techniques result in each lift having a maximum permeability of 1×10^{-7} cm/sec. (Reference Draft Remedial Design Work Plan For Remedial Actions at Operable Unit 2, August 4, 1995). A maximum particle size will be included in the earthwork specifications which will be submitted to the OEPA for review and approval as part of the Disposal Facility design package.

Action: None.

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SPECIFIC COMMENTS

Comment No. 2

Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 1.2 Page #: 1-7 Line #: 23-24 Code: C

Original Specific Comment: 2

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: Borrow area sequencing will be clarified as requested.

Action: Paragraph will be modified to state:

"A secondary or contingent clay borrow area with a potential to provide an estimated 220,000 cubic yards of usable soils (including a 50,000 cubic yard reserve) has been identified adjacent to and underneath the Inactive Flyash Pile and near the South Field Waste Unit areas. This secondary clay borrow area, hereinafter called the South Field Borrow Area, is shown on Figures 1-2 and 1-11. Clay material from this area would be used for the construction of the Disposal Facility cap and/or berm in the event that additional waste (i.e., greater than 2.5 million cubic yards) is designated for on-site disposal. This area would be used for borrow only after all waste is removed from the South Field and Inactive Flyash Pile subunits and the area is clean closed (i.e., meets FRLs.) This area could..."

Comment No. 3

Commenting Organization: Ohio EPA Commentor: DDAGW
Section #: 2.0 Page #: 2-12 Line #: Code:

Original Specific Comment: 3

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: As part of the OU2 and OU5 RIs, samples were taken within the footprint of the proposed borrow areas and analyzed for Tc⁹⁹. The results did not indicate any levels above the FRL.

Action: None.

Comment No. 4

Commenting Organization: Ohio EPA Commentor: DDAGW
Section #: 2.0 Page #: 2-19 Line #: Code:

Original Specific Comment: 4

Comment: Where are the isoconcentration contours in figure 2-6?

Response: The isoconcentration contours in Figure 2-6 show small localized areas of contamination in the plant area. The figure was provided to show that there is no lead contamination below a depth of 0.5 feet in the proposed borrow areas.

Action: Labels and arrows will be added to Figure 2-6 to highlight locations of the lead contaminated soils. A note will be added stating that no lead contaminated soils have been found below a depth of 0.5 feet in the proposed borrow areas.

Comment No. 5

Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.5 Page #: 5-3 Line #: 20-24 Code: C

Original Specific Comment: 5

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.

Response: The need to notify EPA and OEPA of any findings that could materially affect the location of the borrow sources or the suitability of the borrow material prior to modification or expansion of work is addressed in Section 1.2, page 1-16, last paragraph.

Action: Similar agency notification requirements will also be added to Section 5.5.

Comment No. 6

Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 7.3.4 Page #: 7-32 Line #: 17-23 Code: C

Original Specific Comment: 6

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.

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Response: The proposed disposition of drill cuttings in a near surface pit is consistent with the OU2 IDW Management Plan previously approved by the OEPA (reference letter Schneider to Craig dated July 5, 1994, MSL# 531-0297.) By placing the IDW in the waste unit from which it originated, it is ensured that "the waste will be remediated in accordance with the final decision" as emphasized in OEPA's letter.

Action: None.

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