



Department of Energy

Ohio Field Office
Fernald Closure Project
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Springdale, Ohio 45246
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AUG 24 2005

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0310-05

Mr. Thomas Schneider, Project Manager
Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO U.S. ENVIRONMENTAL PROTECTION
AGENCY COMMENTS ON THE DRAFT EXCAVATION PLAN FOR AREA 7 SILOS
AND GENERAL AREA AND THE DRAFT PROJECT SPECIFIC PLAN FOR
EXCAVATION CONTROL AND PRECERTIFICATION OF AREA 7 SILOS AND
GENERAL AREA**

- References:
- 1) Letter, T. Schneider to W. Taylor, "Comments - Excavation Plan for Area 7 Silos and General Area," dated July 27, 2005
 - 2) Letter, T. Schneider to W. Taylor, "Comments - PSP for the Excavation Control and Precertification of the Area 7 Silos and General Area," dated July 27, 2005
 - 3) Letter DOE-0030-05, W. Taylor to J. Saric and T. Schneider, "Transmittal of Responses to Ohio Environmental Protection Agency Comments on the Draft Excavation Plan for Area 7 Silos and General Area and Draft Project Specific Plan for Excavation Control and Precertification of Area 7 Silos and General Area," dated August 17, 2005
 - 4) Letter, J. Saric to J. Reising, "A7 Excavation Plan," dated August 17, 2005
 - 5) Letter, J. Saric to J. Reising, "A7 Excavation Control PSP," dated August 17, 2005

Enclosed for your approval are responses to U.S. Environmental Protection Agency comments on the draft Excavation Plan for Area 7 Silos and General Area as noted in Reference 4. In response to the comment noted in Reference 5 regarding the draft Project Specific Plan (PSP) for Excavation Control and Precertification of Area 7 Silos and General Area, a figure will be included in the revised Excavation Control PSP to reference technetium-99 exceedances of the waste acceptance criteria. Responses to the Ohio Environmental Protection Agency comments on both documents were sent on August 17, 2005.

Upon approval, these comment responses will be incorporated into the final Excavation Plan and revised Excavation Control PSP.

If you have any questions or require additional information, please contact Johnny Reising at (513) 648-3139.

Sincerely,


William J. Taylor
Director

FCP:Reising

Enclosure

cc w/enclosure:

D. Pfister, OH/FCP
J. Reising, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SR-6J
F. Bell, ATSDR
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

K. Alkema, Fluor Fernald, Inc./MS01
J. Chiou, Fluor Fernald, Inc./MS88
F. Johnston, Fluor Fernald, Inc./MS99
C. Murphy, Fluor Fernald, Inc./MS1
ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO
U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS
ON THE DRAFT EXCAVATION PLAN
FOR THE AREA 7 SILOS AND GENERAL AREA**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

AUGUST 2005

U.S. DEPARTMENT OF ENERGY

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT EXCAVATION PLAN FOR THE AREA 7 SILOS AND GENERAL AREA
(20500-PL-0002, REVISION A)

GENERAL COMMENTS

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: Not Applicable (NA)

Page #: NA

Line #: NA

Original General Comment #: 1

Comment: The plan describes a number of excavations at various locations in Area 7. It is not clear, however, what will be done after the excavations are completed. The plan does not discuss any type of backfilling or revegetation of the excavated areas. It is also not clear whether the excavations that create deep holes will be backfilled to prevent storm water from accumulating in those holes. Because the site soils are of low permeability, the holes will likely contain standing water after storm events. The plan should be revised to clarify these matters.

Response: As stated in Section 1.4.6 of the Excavation Plan, "Final restoration of the Area 7 Silos and General Area will follow interim grading and be guided on a sitewide basis by the latest/final version of the Natural Resource Restoration Plan (NRRP, DOE 2002). Area 7 Silos and General Area post-remedial actions are not addressed by this plan."

This is completely consistent with both the U.S. EPA approved Sitewide Excavation Plan and previously approved Implementation and Excavation Plans.

Action: None.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: NA

Page #: NA

Line #: NA

Original General Comment #: 2

Comment: The text refers to various specification sections, but no specifications are included in the plan. Also, Appendix D includes a list of specification sections that should be included. The plan should be revised to include all pertinent specifications in order to facilitate a complete review.

Response: The technical specifications used to govern the remediation of Area 7 Silos and General Area are the same technical specifications used to remediate much of the Former Production Area and have only undergone minor changes since the Area 3B/4B/5 Integrated Remedial Design Package (IRDP) was approved and finalized in February 2004. Please refer to previous submittals of the Excavation Plan for Area 6 Waste Pits and General Area (20600-PL-0005) or Implementation Plan for Area 6 Former Production Area (20602-PL-0001) for copies of these specifications.

Appendix D states: "The technical specifications have not been submitted with this plan as they have been previously approved."

Action: None.

Commenting Organization: U.S. EPA

Commentor: Saric

Drawings

Page #: NA

Line #: NA

Original General Comment #: 3

Comment: Typically excavation work is shown on cross sections and profiles so that the volumes of materials to be removed can be estimated. Cross sections and profiles are also needed to show final grades and required slopes. No such cross sections and profiles are included in the drawings for excavation of Area 7. The drawings should be revised to include cross sections and profiles clearly showing the proposed finished grades and required slopes.

Response: There are a number of methodologies that can be used to estimate excavation volumes. Using cross-sections and profiles is one such method but is not the only one. Since the excavation contours are created in a three-dimensional computer file, the computer can be used to calculate an excavate volume. Therefore, cross-sections and profiles are not included for volume calculation purposes. Typically cross-sections are only included in drawings of a soil remedial design package where deeper excavations are planned. This can apply to the deeper excavation located at the Silos embankment.

Action: An additional drawing will be added to the drawing package showing a cross-section of the excavation at the silos embankment. This cross-section will show the approximate existing grade, approximate location of the dumped rock fill used to armor the eastern river bank of Paddys Run, designed excavation grade, the excavation of the temporary diversion channel, and the construction of the temporary dike. This cross-section will be provided for construction purposes and not for volume estimation purposes.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 1.2.2

Page #: 1-7

Line #: 6 to 8

Original Specific Comment #: 1

Comment: The text refers to a 60-inch diameter overflow line that was installed from the Storm Sewer Lift Station to what is now known as the Storm Sewer Outfall Ditch. The text also cites Figure 1-2 in this regard. Figure 1-2, however, does not show the overflow line or the ditch. The figure should be revised to show the locations of the overflow line and ditch, or the citation of Figure 1-2 should be deleted.

Response: Agree.

Action: The reference to Figure 1-2 will be deleted.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.5

Page #: 3-6

Line #: 18 and 19

Original Specific Comment #: 2

Comment: The text states that "slope stability requirements shall be as stated in technical specification Section 02205." Specification Section 02205 is not included in the plan and therefore cannot be reviewed. Specification Section 02205 should be included in the revised plan.

Response: See Response to General Comment #2.

Action: None.

Commenting Organization: U.S. EPA

Commentor: Saric

Appendix D

Page #: NA

Line #: NA

Original Specific Comment #: 3

Comment: The specification sections listed in Appendix D are not included in the plan and therefore cannot be reviewed. The appendix should be revised to explain why the pertinent specifications are not included for review.

Response: See Response to General Comment #2.

Action: None.