



State of Ohio Environmental Protection Agency

Southwest District

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Bob Taft, Governor
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February 17, 2005

William J. Taylor
U.S. Department of Energy
Ohio Field Office
Fernald Closure Project
175 Tri-County Parkway
Springdale, OH 45246

LEARNER
FILE: 16446.541
2005 FEB 22 P 2:31
FERNALD
LOG F-0428

Re: Disapproval - Transportation and Disposal Plan for OU1

Dear Mr. Taylor:

Ohio EPA has reviewed the document "Transportation and Disposal Plan for Operable Unit 1," received on January 11, 2005. Based upon our review of that submittal, Ohio EPA has a number of attached comments. Ohio EPA therefore disapproves the document until an acceptable revision of the document is completed.

Should you have any questions, please contact Bill Lohner or me at 937-285-6357.

Sincerely,

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

cc: Jim Saric, U.S. EPA
Mark Schupe, GeoTrans, Inc.
Michelle Cullerton, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

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simultaneous load out of OU1 materials and SP-7 materials. Provide a NESHAPs evaluation including the new materials to ensure that air monitoring continues to be adequate.

3. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Pg. #: Line #: Code: C
 Comment: The plan does not sufficiently detail fugitive dust control measures. Additional detail on pro-active measures must be included. Vehicle speed limits, wind speed limits, drop height limits, long pushing distances and other actions should be specified to prevent fugitive dust emissions.

4. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Pg. #: Line #: Code: C
 Comment: The plan does not sufficiently detail measures required to prevent breaching of the lining system. Specific requirements for rebar protrusions, soil cushioning, drop heights, debris ratios etc should be included. Detailed loading specifications are important to ensure these less rigorous containers are not breached during the loading or transportation process. Unlike the waste pit gondola cars, the rail cars proposed for this project are intentionally designed to leak, thus placing much greater emphasis on the importance of liner integrity. After loading, how will the continued integrity of the IP-1 packaging be verified?

5. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Pg. #: Line #: Code: C
 Comment: Additional loadout details should also address concerns such as waste falling off the rail car or loader into areas it is not supposed to be and how that waste will be recovered. Criteria to prevent the loading vehicles arm from extending beyond the opposite side of the rail car should be included. Figure SK-LSA-I-02 shows how an excavator arm should not be extending beyond the rail car. The bucket should always be between the opposite wall of the rail car and the tracks of the loader. Not extending out where waste can fall off into the unplanned areas.

6. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Pg. #: Line #: Code: C
 Comment: The plan suggests DOE intends to ship both lidded and unlidded cars within the same unit train. Will there be any way that the general public will be able to tell that the lids are not supposed to be on one car while they are required on the next car? It would seem likely that members of the public will be calling to say "a lid blew off" or "they sent a car out without a lid in their rush to get done."

7. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Pg. #: Line #: Code: C
 Comment: Reference an approved plan or include a plan for scanning the cars to

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ensure the inside and outside surfaces of the car itself are not contaminated after load out is complete.

8. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.1 Pg. #: Line #: 2nd paragraph Code: C
 Comment: The text states that the east side consists of 15,000 yds³ of material and the west side consists of 47,000 yds³. During the February 8 conference call we were told that SP-7 contained 110,000 tons. Which estimate is most accurate?

9. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.1 Pg. #: Line #: last line Code: C
 Comment: The text states that the east and west sections of SP-7 each include 25% concrete by volume. The Envirocare WAC specifies that the soil:debris ratio should be greater than 9:1. What steps will be taken to comply with the Envirocare WAC requirement?

10. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.1.3 Pg. #: Line #: Code: C
 Comment: The text lacks in details. See comments 1 above and comments below. Locations of the dams on the north and south ends of the loadout area should be indicated. Placement of the pump used to convey storm water from the west side of the tracks to the east side should be shown. Will any grading be necessary to direct the storm water to a sump? How will the piping be routed around or under the tracks?

11. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.1.3 Pg. #: Line #: Code: C
 Comment: A plan to inspect the tracks and the area north of the tracks for spills and a contingency plan for spill cleanup should be developed.

12. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.1.3 Pg. #: Line #: Code: C
 Comment: The text states that there will be dams placed to the north and south of the load out area to contain surface water. The water will be pumped to the south side of the tracks and then to the storm water system.
 1) Where will the rainwater that normally flows in the trench drain after the dams are installed?
 2) What is the capacity in the trench between the two dams? How much rainfall will the trench safely hold? Provide a map which shows all drainage in the area including the flows in the RR trench up-gradient of this Project.

13. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.1.3 Pg. #: Line #: Code: C
 Comment: The current storm water management strategy for large storms specifies that

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rainwater will be allowed to accumulate in the deep excavations in the former Production Area until it can be worked away in the CAWWT. It is our understanding that water flows under gravity southwards in the Main Drainage Corridor and that this flow is throttled at the south end. It would seem under this scenario that storm water flows would also need to be retained in the RR trench.

14. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.1.3 Pg. #: Line #: Code: C
Comment: The text states that storm water will be routed to the southeast corner of SP-7 and then into the site drainage system. It is our understanding that the site drainage system is part of the original site infrastructure and is over fifty years old. That being said, the weekly faxes indicate that the northern half of the existing system will be replaced with temporary piping. Provide details of the temporary piping. Are there any plans to replace the southern half of the system?

15. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.1.3 Pg. #: Line #: Code: C
Comment: This section references the ditch area as "clean". When referring to clean the assumption is that it's not certified but it is considered clean with regard to not requiring water treatment. Please clarify if this assumption is correct.