



State of Ohio Environmental Protection Agency

FERNALD
Southwest District401 East Fifth Street
Dayton, Ohio 45402-2911TELE: (937)285-6357 FAX: (937)285-6249
www.epa.state.oh.usBob Taft, Governor
Bruce Johnson, Lt. Governor
Joseph P. Koncinski, Director

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July 12, 2005

Mr. William Taylor
U.S. Department of Energy
Ohio Field Office
Fernald Closure Project
175 Tri-County Parkway
Springdale, Ohio 45246**RE: DISAPPROVAL - EXCAVATION PLAN FOR THE STREAM CORRIDORS
PPDD AND PADDYS RUN**

Mr. Taylor:

Ohio EPA has reviewed DOE's Transmittal of the "Draft Excavation Plan For The Stream Corridors Pilot Plant Drainage Ditch and Paddys Run (20820-PL-0002) Rev A, dated May 17, 2005. Based upon this review, Ohio EPA's comments are enclosed.

If you have any questions, please contact me or Donna Bohannon.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversightcc: Jim Saric, U.S. EPA
Mark Shupe, HSI GeoTrans
Michelle Cullerton, Tetra Tech EM Inc.

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5. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 2.1; 2.4.2 Pg #: 2-2; 2-7 Line #: 17-19; 26-33 Code: C
 Comment: The bounding of this area of radium contamination is not clear. From the description in the text, it appears to be a single sample result (PRT-22R4) and, due to its proximity to the silos, the possibility of more extensive contamination than 3 cubic yards seem likely. Our assumption has been that there will be a large scale soil removal between the silos and the Paddys Run in this area, including the large amount of rip rap placed along the bank of Paddys Run. What evidence exists that this removal will be limited to 3 cubic yards of soil?

7. Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.4.2 Pg #: 2-5 Line #: 23 Code: C
 Original Comment #
 Comment: This line states that *three* total uranium areas were identified, then states these *four* areas were bound . . . Please correct.

8. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 2.4.2 Pg #: 2-8 Line #: 1-11 Code: C
 Comment: In the dataset, sample RTB-2 has a Radium 226 result of 9.99 and 7.63 pCi/g at 0-0.5 and 1-1.5 depths, respectively. The only RTB sample location I could locate is on figure 2-5, at RTB-3. I assume that RTB-2 is also at or near this location. However neither in the narrative nor on the figures is there a location RTB-2 discussed as exceeding the Radium 226 FRL (of 2.9 pCi/g). Is there no remediation planned for the oxbow area or for sample location RTB-2?

9. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Fig 2-8 Pg #: NA Line #: NA Code: C
 Comment: There is no indication on this drawing of the locations of samples other than those above the FRL. Note that the other figures indicate all sampling locations. It is impossible to tell if sampling was adequate in the Pilot Plant Drainage Ditch without showing all the sampling locations. Please provide a figure that includes all sampling locations.

10. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Fig 2-8 & Drawing 99X-5500-G-00884 Pg #: NA Line #: NA Code: C
 Comment: The sampling location above the FRL (PPDDH-4) on figure 2 does not appear to be a soil removal location indicated on drawing 99X-5500-G-00884, although the other three locations seem to appear on drawing 99X-5500-G-00884.

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11. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 3.1.1 Pg #: 3-2 Line #: 13-15 Code: C
 Comment: The addition of a silt fence to the outlet of the retention basin will slow flow to the PPDD. The retention basin is located north of the soil removal area bounded by point numbers 11-14 on drawing 99X-5500-G-00884.

12. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 3.1.1 Pg #: 3-2 Line #: NA Code: C
 Comment: I have a concern about the proposed entry into Paddys Run at the Railroad trestle. After the removal action in this area, there was significant erosion from the sheet flow coming from the wooded area concentrating at about the proposed road area, then flowing into Paddys Run. Some logs were placed to slow and spread this flow to reduce the erosion. If no alternate road location is found suitable, great care and preparation must be made to prevent the erosive flow into Paddy Run at this location. Also great care was taken to armor and vegetate the stream bank where entry is proposed. It seems counterproductive to remove that.

13. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 3.2 Pg #: 3-2 Line #: 22-24 Code: E
 Comment: This sentence does not seem to make sense. It appears that two sentences may have been combined and/or the sentence should end after "Paddys Run Debris Removal."

14. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.2.1 Pg #: 3-2 Line #: 34 Code: C
 Comment: This sentence states that the haul route "will be different" for all three of the excavation areas in the PPDD. This information should be provided in this excavation plan. Include the appropriate figures for the three haul routes that will be utilized during this excavation.

15. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.2.1 Pg #: 3-2 - 3-3 Line #: Code: C
 Comment: The text does not mention that the IMHR is being certified. According to DOE's CDL for A2P2 - Subarea 3 IMHR, it states that this haul road will be used for "clean traffic in and out of the Silos Project area." It is not clear in the text of the PPDD excavation plan whether the IMHR will be used for "clean" hauling and/or contaminated material. In fact, the plan is contradicting. In one paragraph, it states that care will be taken not to impact the IMHR with contaminated material and in another paragraph states it will be used to haul contaminated material. It only makes sense if an area is certified, DOE would want to keep it certifiably clean and, in this case, find an alternate route to haul.

