



State of Ohio Environmental Protection Agency

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July 27, 2005

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

**RE: COMMENTS- EXCAVATION PLAN FOR AREA 7 SILOS AND GENERAL AREA**

Mr. Taylor:

Ohio EPA has reviewed DOE's "Excavation Plan for Area 7 Silos And General Area, (20500-PL-0002). Rev A DRAFT," dated June 22, 2005. 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 Oversight

cc: Jim Saric, U.S. EPA  
Mark Shupe, HSI GeoTrans  
Michelle Cullerton, Tetra Tech EM Inc.  
Ken Alkema, Fluor Fernald

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Mr. William Taylor  
 July 27, 2005  
 Page 3

Since underground utilities have prevented further borings, how will this area be characterized? It states that the area will be excavated to 572 feet, but doesn't mention anything regarding the material around/under the utilities.

13. Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: 2.3.2                      Pg. #: 2-7                      Line #: 12-14                      Code: C

Original Comment #:

Comment: A7-SA3-8 is bound to the north, east and south. No bounding data is present to the west. How was this excavation bound west of this location?

14. Commenting Organization: Ohio EPA                      Commentor: DSW  
 Section #: 2.3.2                      Pg #: 2-7                      Line #: 25-32                      Code: C

Comment: Have potential issues regarding the equipment and COCs (Table 2-1, 2-2) associated with this equipment brought up by USEPA been adequately addressed.

15. Commenting Organization: Ohio EPA                      Commentor: DSW  
 Section #: 2.3.2                      Pg #: 2-7                      Line #: 34-37                      Code: C

Comment: Although this states that there is no above FRL material in the soil around the SWRBs, there is an accompanying color drawing indication the removal of impacted material from west of the West Retention Basin and under the Spill Basin. The narrative should reflect removal of these impacted soils

16. Commenting Organization: Ohio EPA                      Commentor: DSW  
 Section #: 3.2.5                      Pg #: 3-2                      Line #: 35-36                      Code: C

Comment: What assurances are there that contamination from a remediation/excavation area will not be allowed to be carried in the water leaving the excavation to the certified area?

17. Commenting Organization: Ohio EPA                      Commentor: DSW  
 Section #: 3.3.1                      Pg #: 3-3                      Line #: 20-30                      Code: C

Comment: How will this excavation be integrated with the removal outlined in the "EXCAVATION PLAN FOR STREAM CORRIDORS PILOT PLANT DRAINAGE DITCH AND PADDYS RUN MAY 200520820-PL-0002 REVISION A DRAFT" in this same area?

18. Commenting Organization: Ohio EPA                      Commentor: DSW  
 Section #: 3.3.3                      Pg #: 3-4                      Line #: 18-19                      Code: C

Comment: The Cement Pond should also remain in service until the surrogate material and any associated contaminated soils upgradient has been removed.

19. Commenting Organization: Ohio EPA                      Commentor: DSW

Mr. William Taylor  
 July 27, 2005  
 Page 4

Section #: 3.3.5 Pg #: 3-4 Line #: 30 Code: E  
 Comment: "plug" should read "plugged."

20. Commenting Organization: Ohio EPA Commentor: DSW  
 Section #: 3.3.5 Pg #: 3-4 Line #: 28-36 Code: C  
 Comment: Please provide information on where storm water will flow once the 60 inch storm sewer line will be plugged. This could be done on a separate drawing indicating current inlets to the 60 inch storm sewer line, and the water path once the line is plugged.

21. Commenting Organization: Ohio EPA Commentor: DSW  
 Section #: 3.4 Pg #: 3-5 Line #: 37 Code: C  
 Comment: Please add that the actions will also be consistent with the decision hierarchy and procedures in the OMMP.

22. Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.5.1 Pg #: 3-6, 3-7 Line #: 37, 1-7 Code: C  
 Comment: This section states the sampling protocol for the SWRB clay liner and the underlying and adjacent soil of the K-65 trench will be detailed in the A7 Silos and General Area Excavation Control PSP. These details are not in the referenced PSP.

23. Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.5.3 Pg #: 3-8 Line #: 22-27 Code: C  
 Comment: This paragraph states that isolation trenches are to be treated as contaminated and material will be excavated. However, there is no mention of scanning the trenches once the excavation depth has been reached or collecting physical samples. If any contamination exists in the trenches, material must be removed until sampling results prove it clean.

24. Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.6 Pg #: 3-10 Line #: 37-40 Code: C  
 Comment: This section mentions overburden soil for being certified as clean. How and when will this certification take place? The Agencies have not seen a CDL and PSP for Certification for this.

25. Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: Appendix C Pg #: C-2 Line #: Code: C  
 Comment: This section states numerous times that water will be used to flood the area of the Lab Flume Hood trenches. Where will this water come from?