

Key 107



State of Ohio Environmental Protection Agency

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Southwest District

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2005 NOV 14 A 3:10

November 10, 2005

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Mr. Johnny Reising
US Department of Energy
Ohio Field Office
Fernald Closure Project
175 Tri County Parkway
Springdale, Ohio 45246

RE: DISAPPROVAL - WAC ATTAINMENT PLAN SWRB

Mr. Reising:

Ohio EPA has reviewed DOE's "Transmittal of the Draft WAC Attainment Plan for Sediment in the Storm Water Retention Basins" submitted October 31, 2005. Ohio EPA disapproves the document, since it fails to document the wastes as acceptable for disposal in the OSDF.

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Pg #: Line #: Code: C

Comment: The plan fails to justify the waste as meeting the OSDF WAC. In particular the 25% failure rate of the original samples is inadequately addressed, in sufficient characterization for characteristic waste has been completed, samples have only been collected at the edges of the basin and are not representative of the cross-section of the basins, above WAC resins are visible in the basins, and the inability to conduct real time monitoring during removal all suggest the materials do not meet the OSDF WAC and therefore should not be sent to the OSDF for disposal.

If there are any questions, please contact me at (937) 285-6466.

Sincerely,

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

cc: Jim Saric U.S. EPA
Michelle Cullerton, Tetrattech
Mark Schupe, HSI Geotrans

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