



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 19 2005

REPLY TO THE ATTENTION OF

Mr. Johnny W. Reising
United States Department of Energy
Fernald Closure Project
175 Tri-County Parkway
Springdale, Ohio 45246

SR-6J

RE: A7 Excavation Plan for Support
and Silos Process Area

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) draft excavation plan for the Area 7 support and silos process area.

The excavation plan requires clarification throughout several areas of the document. U.S. EPA has enclosed comments on this document. Therefore, U.S. EPA disapproves the excavation plan for the Area 7 support and silos process area. U.S. DOE must submit a revised plan and responses to comments within (30) thirty days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OERR-SWDO
Con Murphy, Fluor Fernald
Frank Johnston, Fluor Fernald

drawings should be submitted to facilitate proper review of this submittal.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA
Section #: 1.0
Original Specific Comment #: 1

Commentor: Saric
Page #: 1-1
Line #: 6-14

Comment: The text states that the Fernald Closure Project (FCP) was reorganized into nine remediation areas (Figure 1-1). Area 7 is located generally around the southern and western perimeters of the southern portion of the Former Production Area (Areas 4A and 5) and includes the K-65 Silos, Operable Unit (OU) 4 operation and remediation areas, and many of the FCP's support areas and facilities (Figure 1-2). The text further lists these support areas and facilities. Figure 1-2, however, only shows an outline of Area 7. The various support areas and facilities in Area 7 are not labeled. Figure 1-2 should be revised to show and label these components.

Commenting Organization: U.S. EPA
Section #: 1.0
Original Specific Comment #: 2

Commentor: Saric
Page #: 1-3
Line #: 9-10

Comment: The text states, "Any impacted material generated after the OSDF has been closed will be shipped by truck or rail for off-site disposal." The text should be revised to include the name of the facility to which the impacted material will be shipped in case the On-Site Disposal Facility (OSDF) has been closed.

Commenting Organization: U.S. EPA
Section #: 1.1
Original Specific Comment #: 3

Commentor: Saric
Page #: 1-3
Line #: 17-21

Comment: The text states that "...the Area 7 components for the Western Access Road, K-65 Silos, SWRBs, TACO office trailer complex, Security Trailer Complex, Building 82A, the former Lime Sludge Ponds footprint, and the Cement Pond (18N) (see Figure 1-4) are excluded from this document." Figure 1-4 does not show an outline of Area 7 and shows only some of the listed components, making it difficult to visualize where the excluded and included areas are. Figure 1-4 should be revised to clearly indicate the locations of all Area 7 components, both included and excluded. The figure should also include a legend.

Commenting Organization: U.S. EPA
Section #: 1.3 Page #: 1-4
Original Specific Comment #: 4

Commentor: Saric
Line #: 16-19

Comment: The text states that Appendix C lists drawings and specifications applicable to remedial action governed by the excavation plan. Reduced-scale drawings have been included with this submittal; however, the specifications sections listed in Appendix C have not. The document should be revised to include the missing specifications sections and resubmitted.

Commenting Organization: U.S. EPA
Section #: 3.1 Page #: 3-1
Original Specific Comment #: 5

Commentor: Saric
Line #: 6-8

Comment: The text states, "Construction drawings and technical specifications comprise part of the documentation activities (see Appendix C)." Technical specifications have not been included in this submittal and therefore cannot be reviewed. Technical specifications pertinent to this work should be included in the revised document, and the document should be revised as needed.

Commenting Organization: U.S. EPA
Section #: 3.5.1 Page #: 3-6 and 3-7
Original Specific Comment #: 6

Commentor: Saric
Line #: 36-4

Comment: The text states that if above-waste acceptance criteria (WAC) material is found during excavation, the area will be staked and a buffer area will be established adjacent to the excavation in accordance with technical specification Section 02205 to control the spread of contamination. Section 02205 has not been included in this submittal and therefore cannot be reviewed. Section 02205 should be included in the revised document.

Commenting Organization: U.S. EPA
Section #: Appendix C Page #: NA
Original Specific Comment #: 7

Commentor: Saric
Line #: NA

Comment: The specification sections listed in Appendix C have not been included in this submittal and therefore cannot be reviewed. The document should be revised to include all pertinent specifications.

AREA 7 SILOS AND GENERAL AREA EXCAVATION PLAN DRAWING PACKAGE FOR
20500

Commenting Organization: U.S. EPA
Section #:NA Page #:NA
Original General Comment #: 1
Drawings.

Commentor: Saric
Line #: NA

Comment: Typically, excavation work is shown on cross sections and profiles so that volumes of materials to be removed can be estimated. Cross sections and profiles are also required to show the final grade and proper slopes. None of these items have been included in this submittal. The drawings should be revised to include the appropriate cross sections and profiles that clearly show the proposed finished grades and required slopes. The drawings should be revised accordingly and resubmitted in full scale.