



State of Ohio Environmental Protection Agency

Southwest District

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June 19, 2006

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

06-21-06 11:34 AM

RE: OU3 Factsheet Beneficial Reuse of Buildings and Concrete

Dear Mr. Reising:

Ohio EPA has reviewed DOE's June 2, 2006 submittal "Transmittal of the Operable Unit 3 Fact Sheet - Beneficial Reuse of Clean Buildings and Structures at the USDOE-Fernald Closure Project." Based upon this review and the current understanding of operations at the Fernald site, Ohio EPA provides comments on the document as an attachment to this letter.

If you have 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
Mark Shupe, GeoTrans, Inc.
Michelle Cullerton, Tetra Tech EM Inc.

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**Operable Unit 3 Fact Sheet -
Beneficial Reuse of Clean Buildings and Structures**

General Comments:

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

Comment: For those areas where concrete or ballast is going to be beneficially reused as fill, provisions must be added to the LMIC for annual or more frequent inspection to ensure that erosion has not exposed the debris and that the material is functioning to provide the intended benefit.

2. Commenting Organization: Ohio EPA
Section #: General Pg #: Line #: Commentor: OFFO
Original Comment#: Code: C

Comment: It is unclear from the current progression of activities how ballast/stone could be used in the former solid waste landfill as fill. The above FRL excavation of the SWL was never completed due to potentially jeopardizing the railroad tracks. Thus the railroad must be removed prior to completion of the SWL excavation. This would seem to necessitate double handling of the ballast during removal of the track and prior to completion of the SWL excavation and certification. Additional discussion of the logistical issues associated with this proposed beneficial reuse is warranted prior to finalizing the document.

3. Commenting Organization: Ohio EPA
Section #: General Pg #: Line #: Commentor: OFFO
Original Comment#: Code: C

Comment: There may be more actual beneficial uses of the ballast/stone than burying it in the bottom of excavations as fill. An example would be the use of the ballast as a pH buffering agent in the footprint of the basins to reduce dissolved Uranium in surface waters. Another possible use of these materials would be as trail base. It is not clear from our review of the document that such uses are available. DOE should consider revision of the document to allow additional beneficial reuses of ballast/stone with the concurrence of Ohio EPA and USEPA.