



State of Ohio Environmental Protection Agency

Rec'd 7-10-06

Southwest District

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July 7, 2006

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

RE: DISAPPROVAL - OSDF CELL #1 CAP MONITORING DEVICE REMOVAL

Mr. Reising:

Ohio EPA has reviewed "OSDF Phase V Design Change Notice 20105-010" dated June 15, 2006. Based upon our review, Ohio EPA disapproves the DCN and proposed methods of removal/abandonment. Please see attached comments detailing Ohio EPA's concerns with the plan.

If there are 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

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**Ohio EPA Comments-
OSDF Cell 1 Cap Monitoring Devices Removal**

Work Plan

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code:
Comment: Ohio EPA does not believe the approach for partial removal and abandonment of the Pressure Transducer and Settlement Plate monitoring devices is protective of the liner system and likely present unacceptable risk of puncturing the liner in the proposed final state. The potential for a load (vehicle traffic) placed upon the top of the pvc pipe pushing the pipe or the rod through the liner presents a long term threat to the integrity of the OSDF. An alternative approach to dealing with these devices is necessary.
2. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code:
Comment: The LMIC will need to be revised to include specific inspection criteria for OSDF cell #1 to monitor the proposed actions to assess potential failure mechanisms.
3. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code:
Comment: At any location where soil is disturbed and seeding is required, matting should also be placed in accordance with the OSDF seeding spec.
4. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: B.1.b Pg #: 1 Line #: Code: c
Comment: The text requires that the work be performed to minimize impacts to existing facilities including valve houses, final cover, drainage system, roads, etc. The Plan provides no further details or requirements. Lists of actions, prohibitions and requirements designed to prevent damage to the cover and the established vegetation should be developed, including ways to minimize the compaction of soil. Limitations on vehicle weight, turn radius and tire pressure should be included as well as prohibiting activity when the ground is soft. Where at all possible work should be completed with hand tools.
5. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: B.3.b Pg #: Line #: 2nd paragraph Code: c
Comment: The text states that the pressure transducer PVC riser will be filled with cement grout. The drawings show that the bottom 12 inches of the riser is pierced by a series of 3/8 inch holes. Describe the properties of the grout or other actions to be taken to prevent the grout from eventually migrating over the years into the drainage layer. Why is grout preferable to filling with a porous media in the lower portion?
6. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: B.3.b Pg #: 2 Line #: 2nd paragraph of the Section Code: c

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Comment: The text states that the projecting section of the PVC riser will be cut and removed. How will the riser be cut and why can't the riser be cut lower into the vegetative layer? Are there devices which can cut the pipe from the inside?

7. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: B.3.d Pg #: Line #: Code:
Comment: All settlement plates should be surveyed in one final time prior to removal.

8. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: B.3.d Pg #: Line #: Code:
Comment: What prevents removal of the 1-inc diameter stainless steel pipe? Can it not be pulled from the pvc pipe?

9. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: B.3.e Pg #: Line #: Code:
Comment: Upon removal of the junction box, all layers of the cap should be replaced to match the surrounding cap layers (e.g., replace granular layer).

10. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code: c
Comment: The drawings show that roughly 2000 running feet of 2" and 4" PVC conduit will remain buried in the cap at a depth of 7 inches. Runs of hundreds of feet straight up-and-down the slope will remain after this change is implemented. In order to prevent the conduits from becoming preferential flow paths or sinks for soil transport, measures must be implemented to plug these runs. All wiring should be pulled from the conduits.