



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

January 11, 2001

FILE: _____
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Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

RE: COMMENTS ON THE EPLTS TIE-IN PLAN

Dear Mr. Reising:

This letter provides as an attachment Ohio Environmental Protection Agency comments on the EPLTS Tie-In Plan. An un-numbered version of these comments was previously transmitted via e-mail.

If you have any questions, please contact Tom Ontko or me.

Sincerely,

for Tom Ontko

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

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Francie Hodge, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

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Ohio Environmental Protection Agency Comments on the EPLTS Tie-In Plan

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.0 Pg #: 2 of 8 Line #: 2nd paragraph Code: c
Comment: The text states that tie-ins will progress from Cell 1 first then to Cells 2 and 3. The text continues by saying the tie-in order at any given cell will begin with the LDS, followed by the RLCS, and the LCS tie-in will be last. We agree that this is a workable strategy.
The text does not explicitly state that while one lateral is being worked on, the flow in the other laterals will continue. It is our expectation that flow will proceed through the RLCS while the LCS tie-in is occurring and vice-versa.
- 2) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.1 Pg #: 3 of 8 Line #: 2nd paragraph Code: c
Comment: The text states that the LTS/ILTS tie-in work at the CVH will proceed essentially non-stop to minimize the duration of the shutdown. Contingencies should be prepared if the tie-in goes longer than planned.
- 3) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.1 Pg #: 3 of 8 Line #: last paragraph Code: c
Comment: It is our understanding that SOT and SSR will be performed prior to the completion of the tie-in, so operations can begin immediately when the tie-in is complete. This section states these will be performed upon completion of the tie-in work. Please clarify.
- 4) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.5 Pg #: 5 of 8 Line #: 1st paragraph Code: c
Comment: The packer is critically important to this plan. How many packers will be available in case one breaks?
- 5) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.6 Pg #: 5 of 8 Line #: 1st paragraph Code: c
Comment: The text states that the liquid level in the pipe will be verified to be low prior to cutting the pipe. How will this be accomplished?
- 6) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.6 Pg #: 5 of 8 Line #: 1st paragraph Code: c
Comment: We do not understand the meaning of the phrase "Isolation of other LDS, RLCS and LCS flows may be required;". We have commented elsewhere that it is our expectation that flows from the other lateral lines will be maintained.
- 7) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.6 Pg #: 6 of 8 Line #: NOTE: Code: c

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Comment: This note addresses the testing of the existing containment pipe and the events which would follow a failure of this test. While it is understood that construction on the EPLTS must continue if the problem cannot readily be identified and fixed, it is not satisfactory for Flour to simply commit to evaluating the failure at a future time. Any leak, but especially one in the LCS line could mean a release to the environment. At the very least it would indicate that the required double containment is no longer present. Flour needs to commit to addressing these problems in a very timely matter.

8) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.9 Pg #: 7 of 8 Line #: 4th paragraph Code: c
Comment: It is unclear why testing of the containment pipe will be performed at the tie-in point if tests on the existing piping failed. While a large leak may be detected at the tie-in, the passage of such a test will not qualify the joint as certifiably passing. Only after the existing piping has passed testing will the tie-in joint be ready for pneumatic testing which will confirm the fusion of the joints.

9) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.10 Pg #: 8 of 8 Line #: 2nd paragraph Code: c
Comment: How was it determined that water would be added to 14' above the valve house floor to equalize the hydraulic head on either side of the packer? We would expect the back up behind the packer to vary depending on the lateral. We expect the backup would be largest in the case of the LCS line and negligible in the case of the RLCS line.

10) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.9 Pg #: 7 of 8 Line #: Code: c
Comment: We acknowledge that the nine laterals from the cells to the valve houses can not be hydrostatically tested after construction as has been standard procedure since the construction of the Interim line. The carrier pipes are open to the interior of the cell and cannot be pressurized. A high pressure hydrostatic test cannot be performed on the container pipe either, since the carrier pipe needs to be maintained at a similar pressure to prevent collapse of the carrier.
This plan calls for a low-pressure pneumatic test of the container pipe. Justify why a

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pneumatic test was chosen instead of a low-pressure hydrostatic test.

Comments on the appendix

- 11) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: step 34 Pg #: A-3 Line #: Code: c
Comment: What wall penetration work remains to be done?