



State of Ohio Environmental Protection Agency

Southwest District Office

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Bob Taft, Governor
Maureen O'Connor, Lt. Governor
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November 8, 2001

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

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RE: APPROVAL OF OSDF PLANS AND CHANGE PAGES FOR IMPP

Dear Mr. Reising:

This letter provides Ohio Environmental Protection Agency approval of the following:

- On-Site Disposal Facility Impacted Material Placement Plan, Revision 2
- On-Site Disposal Facility Construction Quality Assurance Plan, Revision 1
- Change pages to Section 8 of the IMPP which include alternate placement requirements for Category 3 material (transite panels).

We approve these documents without conditions and we do not see a need to revise and re-issue the CQA Plan but we would like to note that the CQA Plan contains requirements for HDPE pipe joining methods that have caused problems. Section 10.5.2 covers requirements for electrofusion couplings and Section 10.5.3 covers requirements for extrusion welded sleeves.

During Phase III we approved the use of electrofusion joints only to join sections of perforated leachate collection system pipes that are totally contained within the disposal cell. We will comment on the use of these couplings during our review of the Phase IV design package and will only approve their use if there are no practical alternatives.

During the pressure testing of the Cell 1 and Cell 2 laterals this past Spring the Ohio EPA observed that weld separation occurred in extrusion welded sleeves. Such sleeves are inherently weaker than a butt-fused weld. We will only approve their use if there are no

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practical alternatives.

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

Sincerely,


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

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

DOE-FEMP & DOE-OH ON-SITE EMPLOYEES

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