



State of Ohio Environmental Protection Agency

Southwest District Office

4627

FERNALD

LOG D-0309

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6404

2002 DEC 12
Bob Taft, Governor
Maureen O'Connor, Lt. Governor
Christopher Jones, Director

FILE: 6446.609A

December 11, 200²

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

Re: RESPONSE TO COMMENTS - Implementation Plan for Area 6 Solid Waste Landfill and Fire Training Facility

Dear Mr. Reising:

Ohio EPA has reviewed DOE's Response to Comments on the Implementation Plan For Area 6 Solid Waste Landfill And Fire Training Facility received on November 25, 2002. Ohio EPA finds DOE's responses to comments acceptable with the exception of the following:

Original Comment #19:

Ohio EPA agrees that it is sound engineering judgement to reduce gross sediment loading from entering the storm sewer system to reduce the likelihood of plugging or reduced flow. At contaminated sites, it is also desirable to keep soils and sediment in the contaminated areas being remediated, which means controlling, to the extent practical, erosion from areas of disturbed soils, regardless of controls further downstream. In this case, the use of inlet protection is desirable. Use of bales of any kind are not recommended. They have an unacceptably high failure rate. Ohio EPA is not familiar with the term "leaching" as applied to the use of bales, however is familiar with improper installation, undercutting, breaching between bales, plugging, washing away, and many other problems associated with their use. It is better to merely place a piece of silt fence under a catch basin grate than to use hay/straw bales. It is best to construct inlet protection as described in "Rainwater and Land Development". The original comment that use of hay/straw bales are unacceptable still applies.

There was nothing to indicate low flows suitable for silt fence use in the ditches. Too often, water passes around the silt fence in this situation causing a concentrated flow around the fence and causing severe erosion at that point with no added benefit. Many times the silt fence is merely flattened from the flows. If the SWPPP inspections indicate any problems with these silt fences, it is expected that the problems will be corrected immediately.

4627

Mr. Johnny Reising
December 11, 2001
Page 2

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
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Michelle Cullerton, Tetra Tech EM Inc.
Ruth Vandergrift, ODH