



State of Ohio Environmental Protection Agency

Southwest District Office

4630

401 East Fifth Street
Dayton, Ohio 45402-2911

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

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

November 20, 2002

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

2002 DEC 15 A 12:09
FILE: 6446.39
FERNALD
LOG D-0275

Re: DISAPPROVAL - Implementation Plan for SP8

Dear Mr. Reising:

Ohio EPA has reviewed DOE's November 4, 2002 submittal of the "Transmittal of the Draft Implementation Plan for Stockpile Soil and Debris from Infrastructure Projects." Based upon our review, Ohio EPA has the attached comments on this document.

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
- Mary Cullerton, Tetra Tech Inc.
- Ruth Vandergrift, ODH
- Mark Navarre, OEPA Legal

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Comment Pg #: Line #: Code: C
Original Comment #:
Comment: The Sitewide Excavation Plan and Waste Acceptance Plan require DOE to characterize for WAC attainment prior to excavation not post excavation in a pile. It appears that this plan proposes to complete WAC characterization after the materials have been aggregated in SP8. Such an approach provides significant opportunities for dilution of above WAC soils, which is obviously unacceptable. The plan should be revised to focus more on the requirements of projects to ensure no above WAC soils are located in the area to be excavated and dispositioned to SP8. Final WAC characterization would be acceptable at the pile assuming adequate controls, oversight, and assurances are in place that excavations are occurring in areas where no AWAC materials exist.
- 2) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.3 Pg #: 2 Line #: Code: C
Original Comment #:
Comment: Silt fence shall be installed prior to placement of soils into the stock pile, not in "conjunction with placement of initial soils." Additionally, silt fence must be installed consistent with *Rainwater and Land Development*, ODNR.
- 3) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.2 Pg #: 3 Line #: Code: C
Original Comment #:
Comment: Include within WAO's daily inspection, observation to ensure no OSDF prohibited items or probable AWAC materials are being generated at the excavation area. If AWAC materials are encountered, then transfer of the material to SP8 should be prohibited and an in-situ characterization completed.
- 4) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Figure 1 Pg #: Line #: Code: C
Original Comment #:
Comment: a) The proposed SP8 location appears to be on top of an existing wetland in that area. A revised drawing should be submitted showing the location of the existing wetland and how SP8 will not impact it.
b) The drawing should be revised to include the vehicle access roadway, topographic features, and proposed silt fence locations.