



Department of Energy

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JAN 13 2002

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V-SRF-5J
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Chicago, Illinois 60604-3590

DOE-0166-03

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
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Dayton, Ohio 45402-2911

**TRANSMITTAL OF RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS AND THE REVISED IMPLEMENTATION PLAN TO STOCKPILE SOIL AND
DEBRIS FROM INFRASTRUCTURE PROJECTS**

- References:
1. Letter DOE-0018-03, J. Reising to T. Schneider, "Transmittal of the Draft Implementation Plan for Stockpiling Soil and Debris from Infrastructure Projects," dated November 4, 2002
 2. Letter, T. Schneider to J. Reising, "Disapproval - Implementation Plan for SP8," dated November 20, 2002
 3. Letter, J. Saric to J. Reising, "Infrastructure Projects Implementation Plan," dated December 19, 2002

Enclosed for your review and approval are responses to the Ohio Environmental Protection Agency (OEPA) comments and the revised Implementation Plan to stockpile soil and debris from infrastructure projects (Stockpile SP-8). The Implementation Plan has been revised to incorporate the comment responses. This plan was approved by the United States Environmental Protection Agency (USEPA) as referenced above.

JAN 13 2002

DOE-0166-03

Mr. James A. Saric
Mr. Tom Schneider

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If you have any questions or need further information, please contact John Sattler at
(513) 648-3145.

Sincerely,



FEMP:Sattler

Johnny W. Reising
Fernald Remedial Action
Project Manager

Enclosure: As Stated

cc w/enclosure:

N. Hallein, EM-31/CLOV
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T. Schneider, OEPA-Dayton (three copies total of enclosure)
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**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE IMPLEMENTATION PLAN TO STOCKPILE SOIL AND DEBRIS
FROM INFRASTRUCTURE PROJECTS (SP-8)
(60500-PL-0003, REVISION 0)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

Commenting Organization: Ohio EPA
Section #: General Comment Pg. #: Line #: Commentator: OFFO
Original Comment #: 1 Code: C

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 SP-8. 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 SP-8. 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 above-WAC materials exist.

Response: Changes identified below were made to emphasize the dual purpose of the plan, i.e., a) establish a sitewide stockpile for infrastructure projects and b) identify waste acceptance protocols for spoils materials dispositioned to SP-8.

Action:

- a) Section 1.1, Introduction/Objectives:
Changed "protocols" to "waste acceptance protocols"; changed "pending confirmatory sampling" to "pending visual inspection and confirmatory WAC sampling".
- b) Section 1.2, Introduction/Scope:
Added "and to present the approach that will be used to verify that the materials meet the OSDF WAC" to the first sentence.
- c) Section 3.2, Stockpile Construction/Material Placement:
Revised title to "Material Generation and Placement"; incorporated excavation prerequisites (e.g., review of RI/FS data, PWID); incorporated additional in-progress requirements (e.g., *in situ* sampling for above-WAC conditions).
- d) Section 4.1, Waste Acceptance Controls/Project Planning:
Clarified source of analytical data and type of information reviewed.
- e) Section 4.2, Waste Acceptance Controls/Project Execution
Incorporated daily inspection for prohibited items; incorporated prohibition of material transfers to SP-8 and requirement for *in situ* sampling in the event that above-WAC material is discovered.

