



**Department of Energy**  
**Ohio Field Office**  
**Fernald Environmental Management Project**  
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JAN 27 2004

Mr. James A. Saric, Remedial Project Manager  
 United States Environmental Protection Agency  
 Region V, SR-6J  
 77 West Jackson Boulevard  
 Chicago, Illinois 60604-3590

DOE-0125-04

Mr. Tom Schneider, Project Manager  
 Ohio Environmental Protection Agency  
 401 East 5<sup>th</sup> Street  
 Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO COMMENTS AND THE FINAL ON-SITE DISPOSAL FACILITY IMPACTED MATERIAL PLACEMENT PLAN FOR WINTER MONTHS**

- References:
1. Letter DOE-0085-04, W. Taylor to J. Saric and T. Schneider, "Transmittal of the On-Site Disposal Facility Impacted Material Placement Plan for Winter Months," dated December 15, 2003
  2. Letter, J. Saric to J. Reising, "Winter Impacted Material Placement," dated January 15, 2004
  3. Letter, T. Schneider to W. Taylor, "Comments on OSDF IMPP for Winter Months, Rev. B," dated January 16, 2004
  4. E-mail, T. Ontko to J. Chiou, "Response to Comments - Work Plan Without Crushed Concrete," dated January 21, 2004

Enclosed for your review and concurrence are responses to the Ohio Environmental Protection Agency (OEPA) comments and the final On-Site Disposal Facility Impacted Material Placement Plan for Winter Months, Revision 0. Approval of this plan was received from the U.S. Environmental Protection Agency (USEPA) as noted in Reference 2. Verbal approval to proceed in the field was received from the OEPA on January 23, 2004 upon receiving draft comments responses and discussion via email (References 3 and 4).

JAN 27 2004

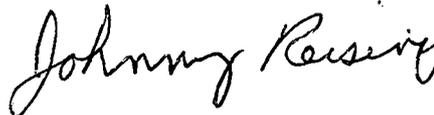
Mr. James A. Saric  
Mr. Tom Schneider

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DOE-0125-04

If you have any questions or require additional information, please contact Johnny Reising at (513) 648-3139.

Sincerely,



FCP:Reising



William J. Taylor  
Director

Enclosure: As Stated

cc w/enclosures:

D. Pfister, OH/FCP

J. Reising, OH/FCP

T. Schneider, OEPA-Dayton (three copies of enclosures)

G. Jablonowski, USEPA-V, SR-6J

M. Cullerton, Tetra Tech

F. Bell, ATSDR

M. Shupe, HSI GeoTrans

R. Vandegrift, ODH

~~AR-Coordinator, Fluor Fernald, Inc./MS78~~

cc w/o enclosures:

K. Johnson, OH/FCP

T. Beasley, Fluor Fernald, Inc./MS60

J. Chiou, Fluor Fernald, Inc./MS64

T. Hagen, Fluor Fernald, Inc./MS1

W. Hooper, Fluor Fernald, Inc./MS64

U. Kumthekar, Fluor Fernald, Inc./MS64

D. Powell, Fluor Fernald, Inc./MS64

C. Van Arsdale, Fluor Fernald, Inc./MS64

B. Zebick, Fluor Fernald, Inc./MS60

ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO  
OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS  
ON THE ON-SITE DISPOSAL FACILITY  
IMPACTED MATERIAL PLACEMENT PLAN FOR  
WINTER MONTHS, REVISION B**

**FERNALD CLOSURE PROJECT  
FERNALD, OHIO**

**JANUARY 2004**

**U.S. DEPARTMENT OF ENERGY**





The use of insulating sacrificial material should be included along with procedures to insulate/cover the working faces of stockpiles during over night and during breaks. Policies such as requiring haul trucks to be unloaded before breaks should be developed.

**Response** The IM soil from stockpiles is treated the same as impacted soil from the excavation area. If the soil temperature is below 32 degrees F, the material cannot be placed in a grid. The stockpile will be constructed and maintained in accordance with Section 6.11 of the IMP Plan with the exception of the RCIs mentioned in Section 5.0B,C, and D of this plan. Options as suggested to protect the stockpiles, or to wait to place material in better weather conditions, are always available in the field at the Construction Manager's discretion. Construction will be advised to avoid long delays before unloading soil from haul trucks during periods of freezing temperatures. Also, Quality Assurance will check soil temperatures at the stockpile and placement location at multiple time frames during the day to ensure that frozen material is not being excavated and placed from the stockpile. Placement will stop when there is no acceptable material available.

**Action:** No Additional Action.

9. **Commenting Organization:** Ohio EPA **Commentor:** OFFO  
**Section #:** 7.0E.15 **Pg #:** 9 **Line #:** **Code:** C  
**Original Comment #:** 9

**Comment:** This allows construction of 4-foot berms. Justification that 4-foot berms will perform adequately and are constructable should be provided.

**Response** The current revision of the IMP Plan does not prohibit the construction of 4-ft. high Category 1 perimeter berms. The berms must be constructed in 12 to 15-inch loose lifts and compacted as described in Section 8.3.2 of the IMP Plan.

**Action:** An RCI will be written to clarify the construction of 4-ft high perimeter berms.

10. **Commenting Organization:** Ohio EPA **Commentor:** OFFO  
**Section #:** 7.0E.18 **Pg.#:** 9 **Line #:** **Code:** C  
**Original Comment #:** 10

**Comment:** Please submit a demonstration which shows a temporary alternative cover can provide the same thermal protection as a 6 - 8 inch soil layer. Until such a demonstration has occurred, placement may not occur when no Category 1 soil is available and freezing temperature is forecasted for more then 24-hours.

**Response** Prior to commencement of daily work, an inspection will be performed on each grid to determine if the grid is suitable for placement of impacted materials as stated in Section 7.0E.8 in this plan. The inspection will be documented on the checklist in Attachment B. If the material is still frozen, placement of Category 1 soil will not occur regardless of the thermal protection method used.

**Action:** No Action

11. **Commenting Organization:** Ohio EPA **Commentor:** OFFO  
**Section #:** **Pg #:** **Line #:** sketch 1 **Code:** C  
**Original Comment #:** 11

**Comment:** The top half of this sketch (Pre-winter grid preparation w/ category 1 crushed concrete) illustrates 6.0B.1.d. Is the purpose of the crushed concrete to prevent the underlying Category 1 material from freezing? If this is the case, what steps are taken to verify that the freeze protection was effective?

**Response** The temperature of the crushed concrete impacted material will be checked prior to placement of overlying impacted material and documented on the daily checklist.

**Action:** No Action.









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| <p>31. Commenting Organization: Ohio EPA<br/>                 Section #:                      Pg #:<br/>                 Original Comment #: 12<br/>                 Comment: We agree to defer consideration of crushed concrete in the intervening layer.<br/>                 Response Agree.<br/>                 Action: No Action.</p> | <p>Commentor: OFFO<br/>                 Line #:</p> | <p>Code: C</p> |
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| <p>32. Commenting Organization: Ohio EPA<br/>                 Section #:                      Pg #:<br/>                 Original Comment #: 13<br/>                 Comment: Agreed, but we repeat our cautions expressed in Comment #8.<br/>                 Response None.<br/>                 Action: No Action.</p> | <p>Commentor: OFFO<br/>                 Line #:</p> | <p>Code: C</p> |
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| <p>33. Commenting Organization: Ohio EPA<br/>                 Section #:                      Pg #:<br/>                 Original Comment #: 14<br/>                 Comment: Agreed.<br/>                 Response None.<br/>                 Action: No Action.</p> | <p>Commentor: OFFO<br/>                 Line #:</p> | <p>Code: C</p> |
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| <p>34. Commenting Organization: Ohio EPA<br/>                 Section #:                      Pg #:<br/>                 Original Comment #: 15<br/>                 Comment: Agreed.<br/>                 Response None.<br/>                 Action: No Action.</p> | <p>Commentor: OFFO<br/>                 Line #:</p> | <p>Code: C</p> |
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| <p>35. Commenting Organization: Ohio EPA<br/>                 Section #:                      Pg #:<br/>                 Original Comment #: 16<br/>                 Comment: Agreed.<br/>                 Response None.<br/>                 Action: No Action.</p> | <p>Commentor: OFFO<br/>                 Line #:</p> | <p>Code: C</p> |
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| <p>36. Commenting Organization: Ohio EPA<br/>                 Section #:                      Pg #:<br/>                 Original Comment #: 17<br/>                 Comment: Thank you.<br/>                 Response None.<br/>                 Action: No Action.</p> | <p>Commentor: OFFO<br/>                 Line #:</p> | <p>Code: C</p> |
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