



State of Ohio Environmental Protection Agency

5387

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March 22, 2004

Mr. William Taylor
USDOE FEMP
P.O. Box 538705
Cincinnati, OH 45253-8705

RE: Disapproval - PSP for Predesign and Excavation Control of A2P11 - Subarea 3

Dear Mr. Taylor,

Ohio EPA has reviewed DOE's February 15, 2004 submittal on the, "Transmittal of the Project Specific Plan for the Predesign and Excavation Control of Area 2, Phase II - Subarea 3 (Supplement to 20300-PSP-0011) Demolition, Soil and Disposal Project, Rev 0 FINAL." Based upon this review, Ohio EPA's comments are enclosed.

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

**OHIO EPA COMMENTS ON A2P2 - SUBAREA 3 PREDESIGN AND
EXCAVATION CONTROL**

Comments:

1. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:
Comment: For some unexplained reason, DOE has tried to combine what are normally two different documents (PSP for Predesign and PSP for Excavation Control) into one document. Excavation Control is dependent upon the results from Predesign, and therefore cannot adequately be addressed until sampling data from Predesign investigations is complete. Resubmit as the Predesign package alone.

2. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.3 Pg. #: 1-1 & 1-2 Line #: 32-34 & 1-9 Code: C
Original Comment #:
Comment: a) This section is unclear. Due to the recent issues regarding variances, please provide clarification to eliminate any further confusion.

3. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.1.2.3.2 Pg. #: 2-3 Line #: 27-28 Code: C
Original Comment #:
Comment: Please provide details on how the boring in the lagoon will be taken. Sampling in lagoons have not been addressed before.

4. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.1.2.3.2 Pg. #: 2-3 Line #: 27-28 Code: C
Original Comment #:
Comment: After field observation, Basin 5 appears to be nothing more than a trench/ditch with a dirt bottom that exists alongside the wheel wash. Provide information regarding the process of how water is "pumped" out of the ditch (manually or automatically), to the AWWT, and then the SWRB?

5. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.1.2.3.2 Pg. #: 2-3 Line #: 34-35 Code: C
Original Comment #:
Comment: This section states that only two samples will be taken in the ditches along the haul road. Ohio EPA finds this to be an unacceptably low number. Considering the asphalt haul road was 'washed' numerous times a day for dust control, the greatest chance for contamination to be found would be along the ditches, not the haul road itself. Please add more sampling locations in the drainage ditches along the haul road.

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6. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.1.2.3.2 Pg. #: 2-3 Line #: 32-36 Code: C

Original Comment #:

Comment:

- a) Provide clarification in regards to the 200' intervals for sample locations along the haul road. Considering the location of these borings and dealing with possible contaminated runoff, more locations would seem to be warranted.
- b) Three of the 12 borings are located over potential "fill areas." These samples along the haul road should be collected by drilling through the pavement until the surface of the native soil is reached.
- c) A sample from each location should be collected from the top 6 inches of native soil.

7. Commenting Organization: OEPA Commentor: OFFO

Section #: 2.1.2.3.2 Pg. #: Line #: Code: C

Original Comment #:

Comment: This section discusses two areas (the Subcontractor Area and the Trailer Complex Area) which currently have trailers, transformers, a tension support structure, and telephone poles set upon them. This predesign does not discuss the trailers or other materials located there. It would appear that these materials will not be removed before this predesign investigation takes place. When will these trailers and materials be removed, and when will adequate characterization of the soils beneath them take place?

8. Commenting Organization: OEPA Commentor: OFFO

Section #: 2.1.2.3.2 Pg. #: 2-4 Line #: Trailer Complex Area Code: C

Original Comment #:

Comment: This document does not address the possibility that flyash may still exist in this area. Several samples should be located near the border of the former active flyash pile to confirm no flyash is located here.

9. Commenting Organization: OEPA Commentor: OFFO

Section #: 2.1.2.3.2 Pg. #: 2-5 Line #: 7-8 Code: C

Original Comment #:

Comment: The section states A2P2-AQL1 will be sampled for radium-226. Is this the only constituent this sample will be analyzed for? If so, then why is this location not being sampled for all ASCOC's? It would appear to make most sense to analyze for all ASCOS's in addition to radium.

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~~10. Commenting Organization: OEPA Commentor: OFFO~~

Section #: 2.1.3.3 Pg. #: 2-6 Line #: 19-20 Code: C

Original Comment #:

Comment: As stated in comment 1, the Excavation Control portion of this document needs to be submitted as a separate PSP once Predesign is complete. It is completely unacceptable to submit an Excavation Control plan with no details. As this section states, the Excavation Control details are unknown until Predesign is done. Remove Excavation Control from this document.