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May 24, 2006
Ref. No. 2501-083

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Ms. Marjorie McLaughlin
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, PA 19406

Subject: Whittaker Site Erosion and Sediment Pollution Control Plan
Docket No.: 40-07455
License No.: SMA-1018

Dear Ms. McLaughlin:

Enclosed is a revised copy of the Whittaker Site Erosion and Sediment Pollution Control Plan (Document No. 82A9519, Revision 2). These revisions were necessary to modify the Plan to allow the use of heavy equipment for excavations within wetland areas of the Whittaker Site to remove radioactive slag materials. We request that you review and approve this Plan and amend License Number SMA-1018 accordingly.

As discussed on previous occasions including in a letter to you dated May 15, 2006 and during your site inspection on May 23, 2006, the Pennsylvania Department of Environmental Protection (PA DEP) was contacted prior to notifying the NRC of the need to enter the wetland areas heavy equipment to remove radioactive materials using heavy equipment. Initially, EnergySolutions contacted Mr. Ed Orris of the PA DEP's Permits and Technical Services Section of the Water Management Division to discuss the need to revise the site Restoration Plan (EnergySolutions Document No. 82A9524), a PA DEP-approved plan required for issuance of a PA DEP/U.S. Army Corps of Engineers Water Obstruction and Encroachment permit waiver. The Restoration Plan, like the Erosion and Sediment Pollution Control Plan, limited slag removal in the wetland areas to the use of hand tools. Mr. Orris recommended that EnergySolutions provide an addendum to the Restoration Plan to allow the use of heavy equipment to remove radioactive materials from wetland areas and submit it for review and approval. The PA DEP approved the addendum to the Restoration Plan on April 19, 2006.

Following approval of the addendum to the Restoration Plan, EnergySolutions invited PA DEP representative Rich Neville of the Water Management Division to the Whittaker site for a first-hand look at the wetland encroachment needs. Mr. Neville met with Keith Shortsleeve, Whittaker Project Geologist and Environmental Compliance Specialist, and recommended EnergySolutions continue with removal of radioactive materials from the wetlands using what ever means necessary, including heavy equipment or hand tools. EnergySolutions agreed to contact the PA DEP after radioactive material removal activities are complete for direction on wetlands restoration.

FULL COST RECOVERY ACTION

TAC NO. 401711

138918

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As discussed during your site inspection, EnergySolutions believes that the wetland area only contains discrete pieces of radioactive slag of various sizes. A semi-quantitative analysis of soil samples collected from the wetland area of interest using on-site gamma spectroscopy indicated that the soil itself is not radiologically impacted. Some of these discrete pieces, however, are located below more than a foot of soil and, in at least one location, within the root system of a mature tree. Heavy equipment is needed to efficiently and effectively remove these pieces of radioactive material.

To acknowledge receipt of the report, please execute the enclosed Document Transmittal Control Form.

EnergySolutions, regrets the delay in making the revisions to the Erosion and Sediment Pollution Control Plan and our oversight in recognizing that this Plan, which is tied to the site radioactive materials license, included the restrictions on use of heavy equipment in the wetland areas of the site.

Sincerely,

A handwritten signature in cursive script that reads "Kevin E. Taylor".

Kevin E. Taylor, PE, CHP
Whittaker License RSO

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Phone: 864-235-3695
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KET/lhc
Enclosure

cc: P. Horkman, Site Supervisor
E. Lardiere, Whittaker Corporation
R. McDonald, Mercer County Conservation District
G. Toumey, Project Manager

CONTROLLED COPY No. 743

**EROSION AND SEDIMENT POLLUTION CONTROL PLAN FOR
PHASE 1 AND PHASE 2 ACTIVITIES AT THE
WHITTAKER REMEDIATION SITE**

**Reynolds Industrial Park
Transfer, Pennsylvania**

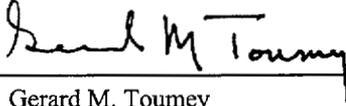
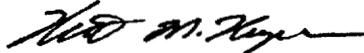
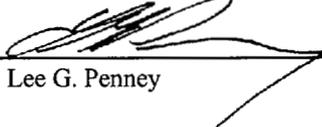
Prepared by:

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May 2006

<i>Project Application</i>	<i>Prepared By</i>	<i>Date</i>
<u>2501</u>	<u>Kevin E. Taylor, P.E.</u>	<u>5/19/06</u>

APPROVALS:

<i>Title</i>	<i>Signature</i>	<i>Date</i>
<u>Project Manager</u>	<u></u> Gerard M. Toumey	<u>5/22/06</u>
<u>Field Services RSO</u>	<u></u> Kenneth M. Kasper, CIH, CHP	<u>5/22/06</u>
<u>Operations Manager</u>	<u></u> Lee G. Penney	<u>5/19/06</u>

Revision Log

Revision Number	Affected Pages	CRA Number	Approval
1	6, 9 & 10, 13-17, Appendix B & Appendix C	11519	K. Taylor
2	All	11807	K. Taylor

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1.0 INTRODUCTION AND SITE HISTORY

This Erosion and Sediment Pollution Control Plan (ESPC) was prepared for the Mercer County (Pennsylvania) Conservation District (MCCD) to provide information regarding the remediation activities at the Mercer Alloys (Whittaker) site located in the Reynolds Industrial Park in Transfer, Pennsylvania approximately 3.5 miles south of Greenville, Pennsylvania. The ESPC was prepared according to the guidance provided by the Pennsylvania Department of Environmental Protection (PA DEP) "Erosion and Sediment Pollution Control Program Manual" (PA DEP 2000). The site remediation will take place in three separate phases: Phase 1 will involve the removal of slag and debris from the concrete pad located in the northern section of the site; Phase 2 will involve the excavation and removal of slag from areas other than the concrete pad; Phase 3 is site closure. This ESPC covers the activities required for Phase 1 and Phase 2. A separate ESPC will be prepared following Phase 2 to cover Phase 3 activities.

Much of the area of the existing Reynolds Industrial Park was a World War II-era U.S. Army base called Camp Reynolds. After the base's closure, ownership of this property changed hands. Beginning in the 1960s, a portion of this area was used by Mercer Alloys, a predecessor of Whittaker Metals Corporation (Whittaker), to produce metal alloys.

In February of 1966, Mercer Alloys received U.S. Nuclear Regulatory Commission (NRC) License No. SUB-864, which allowed it to possess 250 pounds of uranium in the form of calcium uranate for a ferro-molybdenum production process. Natural uranium was to be received in impure calcium molybdate sludge with a weight distribution of 45% water, 41% calcium molybdate, and 14% impurities including the natural uranium. The impurities contained up to 1.5% natural uranium by weight. The sludge was to be blended with uranium-free molybdate to reduce the uranium content to less than 0.05% by dry weight, charged to a rotary drum drier, then charged to an arc furnace to produce ferro-molybdenum slabs. License SUB-864 was not renewed and was allowed to expire in February of 1969.

In December of 1969, Mercer Alloys received NRC License No. SMA-1018 in response to an application for a new license. License No. SMA-1018 authorized the possession of a maximum quantity of 16,000 pounds of uranium and thorium in any form. Ores containing 1 to 2% thorium by weight were to be charged to an alumino-thermic reactor to produce ferro-columbium alloys. Natural uranium, depleted uranium, or thorium were also present as unwanted contaminants in various chemical forms in monel, copper, stainless steel, and other scrap metals that were melted in an arc-furnace process for a ferro-nickel production process. Thorium and uranium bearing waste slags were to be disposed of on-site in accordance with Section 20.301 of 10 CFR 20.

Between October of 1971 and February of 1973, certain assets were leased to Noblemet International Corporation. In April 1973, the leases were terminated and the assets were transferred to a wholly owned subsidiary of the Whittaker Corporation, Whittaker Metals Alloy Division. The site NRC license was amended in 1973 to reflect these changes.

In early 1974, Whittaker decided to terminate all manufacturing operations involving source material at the Reynolds Industrial Park site. In November of 1974, a request for renewal of SMA-1018 was submitted for the storage (possession) of up to 1,000,000 pounds of natural and depleted uranium and thorium in any chemical form. The facility was sold to Exomet, Inc. in late 1974, with Whittaker retaining responsibility for source materials that remained on the premises.

Whittaker, with the assistance of several consultants, has been negotiating with the NRC on plans for terminating the license for this site. The site was placed on the NRC's Site Decommissioning Management Plan (SDMP) list for sites that exceed the criteria for release for unrestricted use, yet do not represent an immediate threat to the health and safety of the public. The SDMP program generally applies to more complex sites that may present unique or difficult decommissioning issues, such as extremely large volumes of contaminated materials.

In mid-1999, Meggitt, LLC acquired Whittaker. The Whittaker name and organization remained unchanged as the licensee for the site. Currently, License No. SMA-1018 allows for the possession of material contaminated with uranium and thorium that were present at the site as of June 1, 1985. The only activities authorized by the license relate to the storage of radioactive material and the decontamination and decommissioning of the site.

2.0 SITE DESCRIPTION OF ACTIVITIES

The site remediation activities at the Whittaker site will take place in three distinct phases. Phase 1 will include the removal of debris and slag material from the concrete pad located in the northern portion of the site. Phase 2 will include laying down stone for a temporary on-site road and the excavation and removal of slag material from areas other than the area covered by the concrete pad. Phase 3 will include final grading and site stabilization as part of the final site closure. At this time, it cannot be predicted what the final state of the site will be.

Whittaker currently maintains the subject property under NRC Radioactive Materials License No. SMA-1018. The license currently allows for the packaging of stock material (slag) and radioactive waste as well as the storage of material and packaged waste prior to shipment. An amendment has been prepared and submitted to the NRC to allow the crushing and blending of slag materials and other similar site debris in order to reduce the average concentration of bulk material shipments to levels that are less than 0.05% by weight uranium and/or thorium. The amendment will also authorize the shipment of waste off site. Phase 1 site work is not expected to involve any excavation of materials; only the removal of material located on the concrete pad. Phase 2 site work, which will include excavating and grading, will be conducted with standard earth moving equipment such as track hoes and front-end loaders.

The future use of the site is unknown. The site can only be accessed through the Greenville Metals property and has limited potential for future use. The areas of the Greenville Metals property that are directly adjacent to the site are currently used for storage of product and scrap. It is possible that the site may hold a future use for Greenville Metals for additional storage area. However, Whittaker has no current plans to use the site for any purpose after the completion of the remediation project. Furthermore, this project will not involve the construction of permanent structures or features on the site following slag and debris removal and site closure activities.

3.0 SITE DESCRIPTION AND TOPOGRAPHY

The Whittaker site is located in northeast Pymatuning Township, approximately 3.5 miles south of the borough of Greenville, Pennsylvania, at approximately 41° 21' 30" north latitude and 80° 24' 00" west longitude. The site is an irregularly shaped parcel of land with a total area of approximately 6 acres located between the Greenville Metals Plant and the Shenango River.

Figure A-1 of Appendix A shows the location of the Whittaker Site on an area topographical map. Figure A-2 of Appendix A provides a contour map showing existing site elevations. A drawing of the project area is provided in Figure A-3 of Appendix A.

There are no buildings on the site. Repeated disposal of process slag, building rubble, scrap metal, and general trash during operations and facility decontamination has raised the elevation of the site. The present surfaces are not level with the general elevations ranging from approximately 945 feet above mean sea level (msl) in Sections 1 and 2 and up to 955 feet above msl in Section 1. The tops of the slopes are approximately 20 to 30 feet above the adjoining river flood plain. There are piles of slag in Sections 2 and 3 that reach an elevation of more than 957 feet. Site dimensions range from approximately 259 to 381 meters north-south and 27 to 107 meters east-west.

Two 30-inch drainage culverts run under the adjacent property owned by Greenville Metals property and discharge into two small, separate areas at the base of the west and north slopes of the ravine, within the boundaries of the Whittaker property. From these areas, separate streams, flow parallel to each other, separated by approximately 30 meters, to the east and discharge into the Shenango River. The origin of these culverts is unknown, but they are suspected of receiving runoff from the surrounding Reynolds Industrial Park. A third 21-inch drainage culvert flows under the northern tip of the property. This culvert receives storm water runoff from the neighboring Reynolds Water Company facility as well as overflow from the facilities settling pond.

The following paragraphs described the four sections of the site previously delineated based on radiological characterization. They were identified based on their physical location and the potential to contain radioactive slag. The sections are labeled on Figure A-4 of Appendix A.

3.1 SECTION 1

Section 1 is the southern portion of the site. It is bordered by the ravine's southern drainage stream on the north and northeast, by Greenville Metals on the west and south, and by the floodplain on the east.

The Section 1 plateau terminates in steep embankments of up to 33° that drop to the floodplain level in an almost semi-circular line from the northwest to the southeast limits of the section. The area topography drops about 8 vertical meters from the edge of the plateau to the base of the slope.

Section 1 consists primarily of gravelly slag intermingled with numerous small pieces of metal scrap. Occasional large pieces of slag are found on the eastern embankment and toward the southeast portion of Section 1. The area of this section that contains slag is approximately 3,020 square meters (m²) (0.64 acres).

Section 1 is sparsely vegetated, with only scattered weeds growing in the majority of the waste material. There are some small trees and a few more weeds growing in the western portion of the section where there is more soil and less slag. The embankment media is primarily soil and contains mature trees and dense undergrowth. There are no structures, fixed equipment, or paved areas in Section 1.

3.2 SECTION 2

Section 2 is the central portion of the site located between Section 3 on the north, Greenville Metals on the west, the ravine on the south, and the floodplain on the east. The base of the eastern slope of the site is the closest to the Shenango River in Section 2, with as few as 3 meters of floodplain between the property boundary fence and the edge of the river.

The area of Section 2 that contains slag is approximately 5,050 m² (1.1 acres). The height of the slag pile, from the Section 2 plateau to the base the eastern slope, ranges from about 6 meters on the east to almost 5 meters on the south. There are more topographical irregularities in Section 2 than in Section 1. At one point in the western half of Section 2, the elevation reaches a height of more than 10 meters above the floodplain. Maximum slopes are nearly 40° on the southern and eastern slopes.

One pile of gray slag material in the northern area of Section 2 exhibits the highest dose rates of any of the material located on site. The southern portion of Section 2 is visually distinct by the predominance of a blue/green glassy slag on the plateau ground surface and on the southern embankment.

The extent of vegetation in Section 2 is similar to that in Section 1. The areas that are predominantly slag are devoid of vegetation or contain only sparsely distributed weeds. The area in the west and the pile in the south-central area, composed predominantly of soil, have more weed and grass growth, while the northeast area has weeds, grasses, and small trees. The southern slope of glassy slag has no vegetation, while the long eastern embankment, which appears to be primarily soil, has small to mature trees and thick undergrowth. There are no structures or fixed equipment in this section. A small area in the west-central portion of the site is covered with a concrete pad.

3.3 SECTION 3

Section 3, the northernmost section of the waste and slag storage area, is the largest in size at approximately 6,200 m² (1.2 acres). It is bounded by the water company property to the northeast, Greenville Metals to the north and west, Section 2 to the south, and the floodplain to the east. The height of this section varies from 6 to nearly 8 meters from the bottom of the embankment to the plateau, with the steepest slope at approximately 43°.

The eastern half of Section 3 is a large flat plateau that terminates in a steep embankment down to the river floodplain on the east. This area is mostly soil with numerous small pieces of metal scrap on the surface. Corroded steel drums, pieces of process and building materials, and wood are scattered on the embankments. Only an area of the northeast embankment appears to contain significant volumes of subsurface slag or contaminated waste material. There are no structures, fixed equipment, or paved areas in this eastern portion.

The western half of Section 3 consists of a very large pile of a slag and soil mixture, large three-sided storage bins, rows of full 55-gallon drums, scrap process equipment, and smaller tote bins and drums containing radioactive slag. A large concrete slab that was used to stage and store materials for use in an adjacent processing building covers this area. The large three-sided bins are embedded in the concrete pad. The vegetation in Section 3 is more extensive than the other sections with the upper areas containing weeds, grasses, and small trees and the embankments containing larger trees and more vegetation.

3.4 SECTION 4

Section 4 consists of a narrow strip of steep embankment connecting Section 1 in the south to the southwest tip of Section 2. The embankment averages about 15 meters wide and 6 meters above the ravine and contains an area of approximately 500 m². The north and west borders are contiguous with the Greenville Metals property and its eastern edge is at the bottom of the slope in the ravine. The vegetation is similar in type and density to all the other embankments. There are scattered pieces of slag, metal, and debris throughout this section.

3.5 RAVINE, FLOODPLAIN, AND WETLANDS

In addition to the four waste and slag storage sections, there is a large triangular shaped ravine area within the boundaries of the Whittaker property. This area is located between Section 2 to the north, Section 4 to the west, and Section 1 to the south. A barbed-wire fence delineates most of its eastern border. The ravine's maximum dimensions are approximately 61 meters, both east-west and north-south. The principal features of this section are two small discharge ponds, their two west-to-east flowing drainage streams, and an east-west ridge of land that separates the streams and rises above them by approximately 6 meters. The vegetation consists of heavy undergrowth in the lower floodplain and more trees of various sizes along the upper elevations. There appears to be slag or other debris located only at the bases of the slopes of the adjoining site sections. There are no structures, paved areas, or fixed equipment in this section, other than the two large concrete culverts that discharge from the Reynolds Industrial Park to the two streams described earlier.

The majority of the river floodplain adjacent to the Whittaker Site is outside the boundaries of the Whittaker property. This floodplain forms a border between the site and the Shenango River to the east that varies in width from less than three meters in the central portion of the site to a maximum of approximately 46 meters in the southeast and at the northern tip. Vegetation in the floodplain is moderate to dense and varies from weeds and grasses to large, mature trees. While this section of the Shenango River does not have floodplains defined by the U.S. Federal Emergency Management Administration (FEMA), the "floodway," defined as the area within 50 feet of the river's edge, is shown in Figure A-2 of Appendix A.

The site contains wetlands between the base of the slopes and the river. A copy of the wetland delineation report is provided as Appendix B. The wetland boundaries are shown on Figure A-2 of Appendix A.

4.0 SOILS

The soil makeup of the Whittaker site varies due to the combination of natural soil types and the slag and other foundry materials deposited on the site over the years. The following discussion on soil types begins with a description of the natural soil types as described by the U.S. Department of Agriculture (USDA) soil survey of Mercer County. Following this discussion, information of the waste materials deposited on site is provided.

According to a USDA soil survey map, provided as Figure A-5 in Appendix A, the Whittaker site lies primarily within the Chenango-Braceville-Halsey soil association (USDA 1971). These soils are characterized by well drained to very poorly drained, gently sloping to steep soils underlain by sandy and gravelly deposits, on stream terraces and moraines. This association occurs as bands on terraces along most major streams in Mercer County, including the Shenango River. About 35% of this association consists of Chenango soils, about 17% of Braceville soils, about 15% Halsey soils, and about 33% of minor soils (USDA 1971).

Specifically, the Whittaker site includes soils of the Braceville and Halsey types, as well as Red Hook silt loam. Based on a 1958 aerial photograph provided in the county soil survey (USDA 1971), the site consisted of an elevated plateau of Braceville gravelly loam, moderately eroded, with a 3 to 8 % slope. These soils are moderately well drained and moderately slowly permeable. They are wet in spring and somewhat droughty in summer.

Adjacent to the Braceville soil area to the east and southeast is an area of Halsey silt loam. This soil is typically poorly drained, to very poorly drained and moderately slowly permeable. Adjacent to the Braceville soil area to the west and southwest, about 7 to 10 meters lower in elevation, is an area of Red Hook silt loam. This soil type makes up the area between the elevated Braceville plateau and the Shenango River. These soils are moderately well drained. They have a seasonal high water table and a rapidly permeable substratum.

Recent investigations of the Whittaker site suggest that waste materials from the foundry operations were disposed of in trenches dug in the natural Braceville soil area and also along the slope on the eastern side of the site making the boundary between the Braceville soils and the Red Hood soils. Waste deposited in these areas included large volumes of slag material and sand. Pieces of slag found on the site vary in size from a foot or more in diameter to less than a centimeter. Disposal areas have been measured up to several meters deep. Although, no studies have been performed to provide soil characterization information of the disposal site, visual observations following rain events indicate that the area is well drained and is likely highly permeable.

Existing soil conditions are not expected to impose any limitations on material excavations. Under normal non-excavation conditions observed during quarterly site inspections from 1999 through 2003, the slag material has shown little signs of significant erosion. Some slopes containing only native soils that are located outside the expected excavation areas, have shown signs of erosion; however, erosion in these areas should have no impact on the proposed site activities and will not be controlled. Furthermore, material excavation activities are not expected to impact these natural slopes.

5.0 CHARACTERISTICS OF PROPOSED ACTIVITY

As previously discussed, the final disposition of the Whittaker site is currently unknown. The economics of removing all of the slag material, including slag material with radioactive material concentrations less than some potential future release criteria, needs further evaluation. The option of removing all of the slag will be compared against the option of closing the site under Pennsylvania's Act II requirements. Factors affecting such a decision will be based on the market value of the on-site material available for recycling and reuse options, the approval of such options by the affected regulatory agencies and stakeholders, and the current costs and future costs of closing the site as an Act II waste site. Regardless of the ultimate disposition of the site, the MCCD and the PA DEP will be involved in the planning and approval. A revised ESPC will be prepared in the future to address the final site activities such as laying fill material, grading, and site stabilization.

It is expected that final embankments between the site plateau and the floodplain will be no greater than 1 ½ : 1 (horizontal to vertical), or a 67% slope. The plateau area will have a slope of about 2%, sloping east to the embankment. However, because it is uncertain the exact amount of waste material that will be removed and from where, these contours are estimates and the final site conditions may be different. The revised ESPC will be submitted to the MCCD near the completion of the waste removal phase and will provide a more definitive description of the final site contours.

6.0 SITE RUNOFF AND SURFACE WATERS

The Whittaker project will control the migration of slag material and sediments from excavation areas at the base of the excavation area slope or at the top of a slope if the slope is not being disturbed. Due to the extremely good drainage characteristics of the site slag pile, little water is available for runoff from the site and no controls are necessary to control storm water flowing onto or within the site. Furthermore, the drainage characteristics do not allow for pooling or channeling of storm water. Representatives from the MCCD and the PA DEP witnessed these conditions on a site visit on March 30, 2004.

Sediments generated from the runoff of storm water that falls within the site boundary and excavated areas will be controlled through the use of silt fencing at the base of the slag pile slopes. PA DEP best management practices (BMP) will be used in the design of this sediment control system. This drainage area (total slag pile area) is approximately 3 acres; however, not all of the area will be excavated at one time. As evident from visual observations during rain events, there is little to no flow from off site onto the project site.

Using the Rational Equation provided below (PA DEP 2000) for estimating peak flow rates in small watersheds (200 acres or less), the estimated peak runoff rate (Q) to sediment control system is 0.7 cubic feet per second. This assumes a 3-acre drainage field area (A), a 0.2 runoff coefficient (C) (construction site, bare packed soil, rough), and a 1.1-inch rainfall depth for a 1-hour duration and 2.33-year return period (I) (Penn State 1970).

$$Q = C \times I \times A$$

Q = Peak runoff rate in cubic feet per second

C = Runoff coefficient (dimensionless)

I = Rainfall intensity in inches per hour

A = Drainage area (acres)

Due to the low runoff from the site, runoff from the project site is not expected to impact the existing downstream watercourses.

The primary water body receiving runoff from the Whittaker site is the Shenango River and two unnamed streams that flow directly into the river. The PA DEP Chapter 93 Receiving Water Classification of the Shenango River is Class 3/Warm Water Fishes. The river flows north south along the eastern edge of the site. The two unnamed streams are located in the ravine areas (see Section 3.5) and flow parallel to each other, separated by approximately 30 meters. These streams flow to the east and discharge into the Shenango River.

The waste slag pile encroaches into the Shenango River floodway along site's eastern edge near the central area identified as Section 2. Loose slag material is located within several feet of the riverbank and there is a possibility that some slag is in the riverbed. The site wetlands have been delineated and loose slag material has also encroached into these areas. Slag piles will be removed from the floodway using heavy equipment; however, the equipment will pull material out of the floodway and will not add material into the floodway.

Additional excavation and slag segregation activities will be undertaken in 2006 within the wetland encroachment, floodway, and river bank. Soil borings will be advanced in this area using a small boring machine to characterize the extent of slag to be removed. Excavation will be performed on the embankment and will extend across the floodway to the bank of the Shenango River. Some trees located in the floodway and on the stream bank will also be removed that have slag entangled in their root system.

7.0 RUNOFF AND SEDIMENT CONTROLS

As described in Section 6.0, Whittaker will use a combination of BMPs to control runoff and sediment before and during excavation activities. These controls will be installed to prevent the intrusion of sediments and larger pieces of slag from entering wetlands and waterways.

A system of silt fencing will be established along the base of the slag pile to control sediments from reaching adjacent surface waters and wetland areas. The fencing will be designed and installed according to PA DEP BMPs (PA DEP 2000). The silt fencing system will consist of 30-inch filter fabric fence reinforced by staked straw bales in some areas and 33-inch super filter fabric fence supported by existing chain link fence in other areas.

The anticipated location of silt fencing is provided in Figure C-1 of Appendix C. Approximately 1,130 linear feet of reinforced silt fencing and 330 linear feet of super silt fencing will be used. The construction Detail Sheet is provided as Figure C-2 in Appendix C. Standard construction detail drawings of the BMPs are provided as Figures C-3 and Figure C-4 in Appendix C. Filter fabric fence worksheets for the proposed silt fencing from the PA DEP reference manual (PA DEP 2000) are provided as Figures C-5 and C-6. No other supporting calculations are needed for the installation of the silt fencing system.

The silt fencing will be installed prior to any on-site excavations. The silt fence system will remain on-site and will be maintained until site closure activities are complete and the site is stabilized with natural erosion and sediment controls (sloping and vegetation). Table 1 of the Detail Sheet (Figure C-2 of Appendix C) provides the overall project sequence.

Table 7-1 provides the sequence for installation and removal of the silt fencing.

**TABLE 7-1
 INSTALLATION AND REMOVAL OF SILT FENCING**

Step	Action	Estimated Completion
1	Installation of chain link fence (Section 2)	Complete
2	Removal of existing silt fencing	May through July 2004
3	Installation of super filter fabric fence (Section 2)	June 2004
4	Installation of filter fabric fence reinforced by staked straw bales (Sections 2 and 3)	June 2004
5	Installation of filter fabric fence reinforced by staked straw bales (Sections 1 and 4)	July 2004
6	Maintenance of silt fencing	June 2004 through September 2006
7	Removal of silt fence system and chain link fence	October 2006

8.0 INSPECTION AND MAINTENANCE PROGRAM

During active excavation activities, the runoff and sediment control devices will be inspected on a weekly basis and following any significant rain events or snow melts. The inspection will include a walk down of all silt fencing. The remediation project Site Supervisor will keep a log of these inspections and record the findings.

Routine maintenance activities conducted during the weekly inspection may include:

- removal of debris and organic materials from the base of the silt fencing,
- retying sagging silt fences,
- replacing damaged silt fences.

If significant amounts of sediment are beginning to build at the base of a silt fence, the sediment will be removed, containerized, and sampled for radioactive materials. If the material is clear of radioactive materials, it will be stored on-site for potential use as fill during final site closure activities. Radioactively contaminated sediments will be disposed of as low-level radioactive waste.

For significant breaches or failures in the control devices, appropriate actions will be taken to reestablish control as soon as possible. Repairs will be conducted according to PA DEP BMPs (PA DEP 2000). The MCCD will be notified of such breaches and repairs.

The site will be inactive during the period from late fall until early spring. Prior to leaving the site for the shut-down period, the site excavations will be stabilized using PA DEP BMPs. The actual stabilization mechanism(s) will be determined according to the extent of the excavation at the time of shut-down. During the shut-down period, the site will be inspected at least once a month; after significant rain events or snow melts; or at a frequency determined by the MCCD. These site inspections will be conducted and documented in the same manner as described above for the weekly inspections. Table 2 of the Detail Sheet (Figure C-2 of Appendix C) provides the inspection schedule.

9.0 SITE STABILIZATION

Temporary and permanent stabilization measures will be taken at the site to minimize erosion and sediment generation.

Temporary controls will be implemented whenever soil is exposed during waste material excavations. Temporary controls will involve placing material on top of the exposed area to absorb rainfall impact, increase the rate of infiltration, and reduce soil moisture loss due to evaporation. Materials acceptable for use include on-site slag materials and mulches. If slag materials are used to temporarily stabilize an exposed area, the material will have a thickness of at least 1 foot. Mulch application rates are provided in Table 3 of the Detail Sheet (Figure C-2 of Appendix C). The preferred method will be the use of slag materials if the exposed soils are within area of the slag piles. The stabilization specification worksheet from the PA DEP reference manual (PA DEP 2000) is provided as Figure C-7 in Appendix C.

Temporary stabilization methods will be used for periods of temporary demobilization. Because of the permeable nature of the waste slag materials, slopes of waste materials will not be benched, grooved, or tracked for the purpose of erosion and sediment control. However, the slopes will be maintained such that the design specifications of the silt fencing are not exceeded and to minimize channeling and runoff.

Permanent site stabilization will be addressed in a Site Closure Plan and a Phase 3 ESPC Plan. These activities may include placement of clean fill, final site grading, placing of topsoil layer, and seeding. The details of the site closure and permanent site stabilization cannot be determined until removal of all waste materials from the site is complete. At this time, it is uncertain how much material will be removed.

Areas will be seeded according to the guidance provided by the PA DEP (PA DEP 2000).

Vegetated areas shall be considered permanently stabilized when a uniform 70% vegetative cover of erosion resistant perennial species has been achieved, or the disturbed area is covered with an acceptable best management practice (BMP), which permanently minimizes accelerated erosion and sedimentation. Until such time as this standard is achieved, interim stabilization measures and temporary erosion and sediment control BMPs that are used to treat project runoff may not be removed.

The following stabilization measures and construction sequence will be implemented to minimize impacts to the wetland, floodway, and stream bank.

1. The existing super-silt fence will be extended into these areas to control sedimentation from surface water runoff.
2. An excavator will be used to turn over the soil to expose the chunks of slag. To minimize damage to the wetland cover, the reach of the excavator will be utilized to limit movement of the excavator within the wetland area.
3. Non-radioactive materials, e.g. soil, will be left in place to minimize the volume of material removed from the wetland and floodway areas.
4. The slag will be transported to the slag stockpile that is within the footprint of the existing controlled project stabilization area until it is shipped off site for disposal at the EnergySolutions disposal facility in Clive, Utah.
5. A radiological survey will be completed as the material is removed from the wetland, floodway and river bank to verify that all radioactive materials have been removed.
6. Upon completion of slag removal, the wetland, floodway, and stream bank will be restored to the satisfaction of the PA DEP.

10.0 MATERIAL DISPOSAL AND RECYCLING PROCEDURES

All material (sediments, debris, and litter) will be collected and disposed of or recycled. Debris and litter will be disposed of as sanitary waste. Sediments will be collected in containers and stored on-site during the course of the project. The sediment will be analyzed for radioactive constituents. If the concentrations of radioactive constituents are consistent with background levels, the sediments will be mixed with fill material and used on-site. If the concentrations of radioactive constituents are greater than background levels, the sediments will be disposed of as low-level radioactive waste.

Damaged silt fencing materials will be surveyed for radioactive contamination and disposed of as either low-level radioactive or clean waste. The free release criteria for clean waste will be 1,000 disintegrations per minute per 100 square centimeters (dpm/100cm²) beta-gamma contamination averaged over an area no greater than one square meter. The maximum contamination cannot exceed 3,000 dpm/100cm² beta-gamma. These criteria, provided in the NRC's Regulatory Guide 8.16, are based on standard release criteria applied during the decommissioning of nuclear facilities. Following the completion of the project, representative sections of the silt fencing will also be surveyed. If the representative sections meet the release criteria, all of the silt fencing will be disposed of as clean waste. If sections of the fence are found to be contaminated above the release criteria, the entire fence section (1, 2, 3 or 4) will be surveyed. Contaminated pieces of fence will cut out be disposed of as low-level radioactive waste while clean fence materials, including fabric, stakes, wires, etc., will be disposed as clean trash. Existing chain link and barbed wire fencing will be removed and recycled, disposed of, or reused on site.

11.0 REFERENCES

Pennsylvania Department of Environmental Protection (PA DEP). 2000. "Erosion and Sediment Pollution Control Program Manual." Bureau of Water Quality Protection, Division of Waterways, Wetlands, and Erosion Control. March.

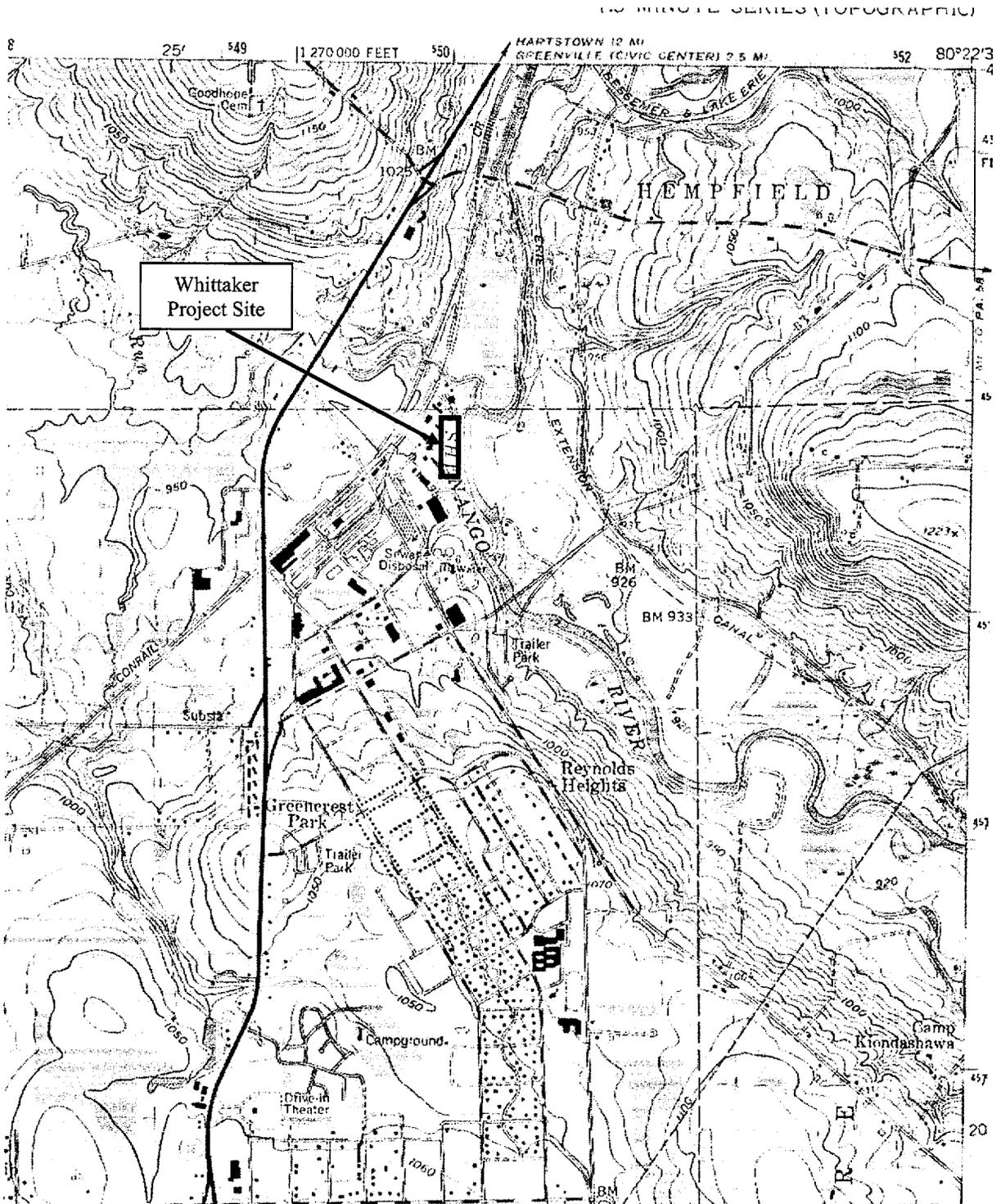
U.S. Department of Agriculture (USDA). 1971. "Soil Survey, Mercer County, Pennsylvania." April.

Pennsylvania State University (Penn State). 1970. "Analysis of Rainfall-Duration-Frequency for Pennsylvania." Institute for Research on Land and Water Resources. August.

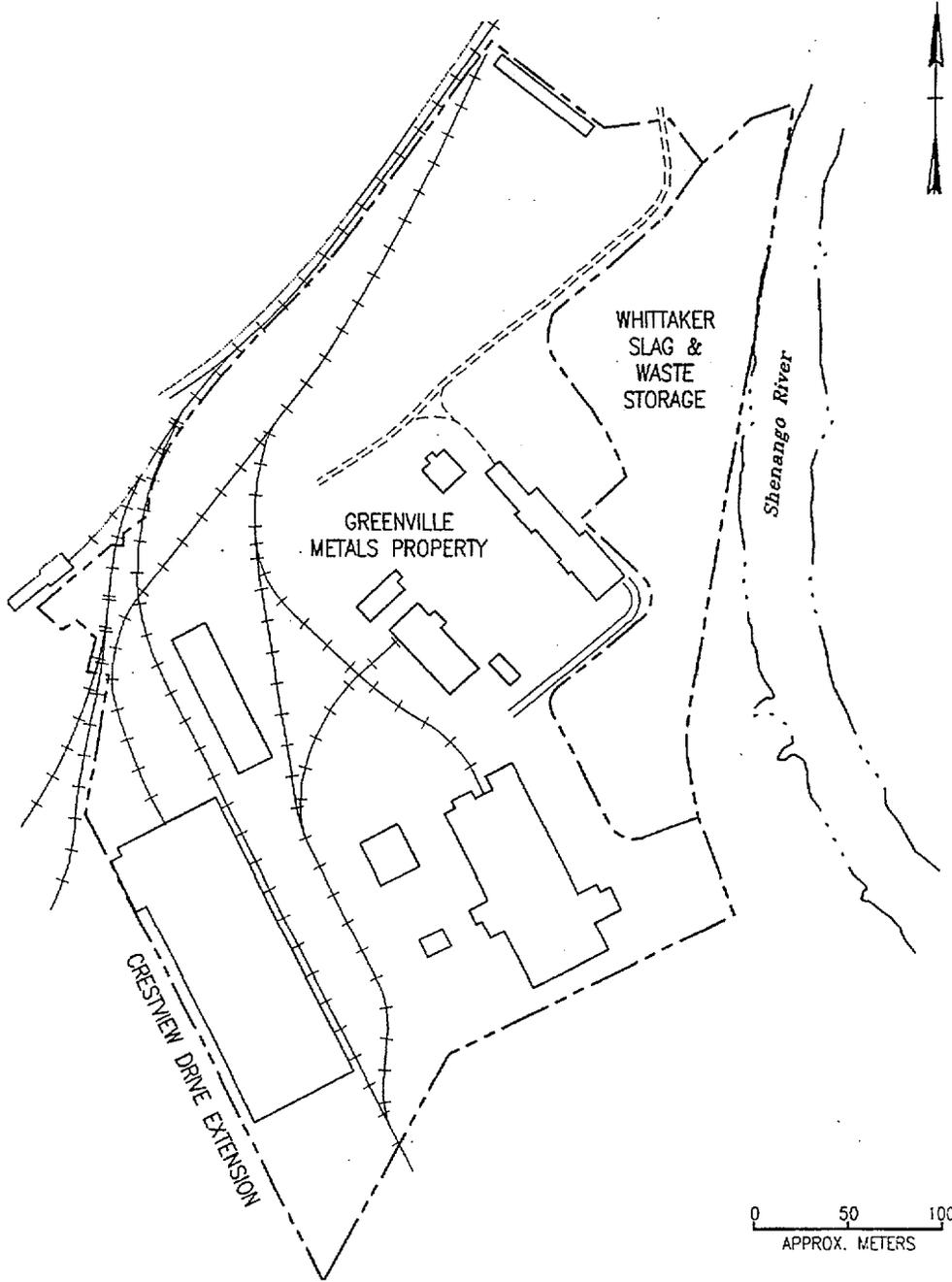
APPENDIX A

Figure A-1	USGS Topo Map-Sharpville, PA
Figure A-2	Existing Site Contours, Wetlands and Floodway
Figure A-3	Project Area
Figure A-4	Project Area Sections
Figure A-5	USDA Soils Map

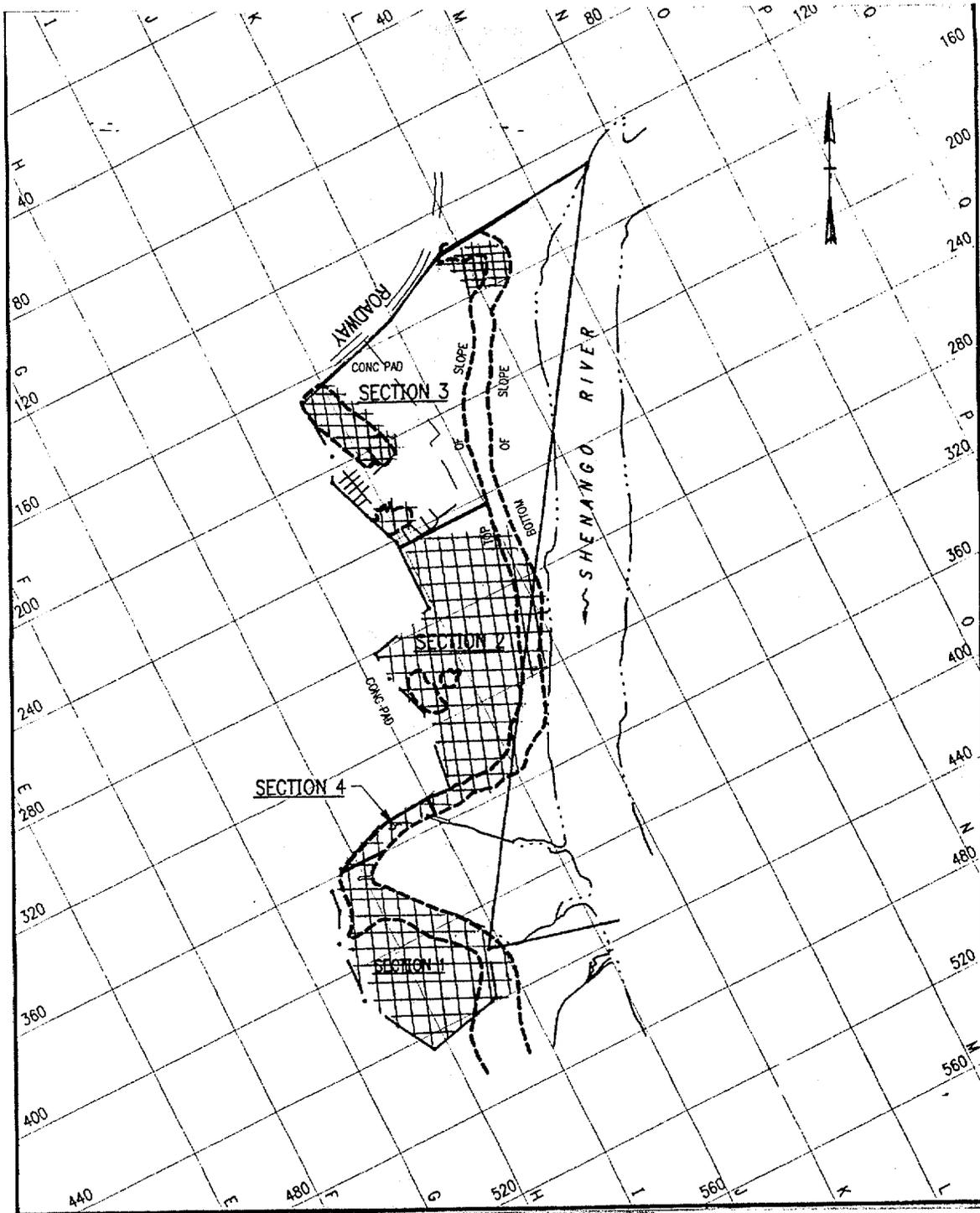
FIGURE A-1
USGS TOPO MAP - SHARPSVILLE, PA
(Photorevised 1981)



**FIGURE A-3
PROJECT AREA**



**FIGURE A-4
PROJECT AREA SECTIONS**





Document Number 82A9519
Revision 2

APPENDIX B
Wetland Delineation Report



036200425.0001.00001

October 28, 2003

Kevin Taylor
Senior Health Physicist
Sciencetech, Inc.
17 College Street, Suite D
Greenville, SC 29601

**Subject: Whittaker Corporation Site – Greenville, PA
Wetland Delineation**

701 Edgewater Drive
Wakefield, MA 01880

Tel: 781-246-5200
Fax: 781-245-6293
www.m-e.com

Dear Mr. Taylor,

Metcalf & Eddy (M&E) is pleased to provide you with the attached technical memorandum summarizing the results of our wetland delineation at the subject site. As you know, Christina Hoffman of M&E visited the site on September 30, 2003 and hung wetland flags delineating wetland boundaries within the site limits. Ms. Hoffman prepared the attached technical memorandum under my direction.

M&E appreciates the opportunity to provide you with assistance on this project, and looks forward to working with Sciencetech again in the future. Please do not hesitate to call me at (781) 224-6474 if you have any questions regarding the enclosed technical memorandum, or require additional wetland assistance on any other projects.

Very Truly Yours,
METCALF & EDDY, INC.

Jennifer A. Doyle-Breen
Project Manager and Wetland Scientist

**WHITTAKER CORPORATION SITE - GREENVILLE, PENNSYLVANIA
WETLAND DELINEATION
SEPTEMBER 30, 2003**

An M&E wetland scientist delineated the wetlands at the Whittaker Corporation Site in Greenville, PA on September 30, 2003. An initial review of the Pennsylvania regulations and policies prior to the delineation indicated that delineations within the state should be in accordance with the 1987 Corps of Engineers Wetlands Delineation Manual, which employs a three-parameter methodology (including hydric soils, hydrophytic vegetation, and hydrology as the main indicators of a wetland). Therefore, this methodology was used to delineate the wetlands at the Whittaker Corporation Site.

The areas of slag along the river, the site boundaries, and general locations of uplands and wetlands were identified during an initial site walkover. A single wetland was identified on the site and extended from the northernmost site boundary fence to the southernmost site boundary fence, and beyond in both directions. The slag pile, which is parallel to the Shenango River, occupies the length of the site as well. In the northern portion of the site, the wetland extends from the Shenango River to the bottom of the slag pile. In the southern portion of the site, the wetland is adjacent to the Shenango River but is separated from the slag pile in some locations by a strip of upland. Areas of wetlands were identified by hanging pink flagging on vegetation or the site fence. The flagging placed at the site identifies wetland boundaries on the Whittaker Site proper, and does not represent wetland limits outside of the site boundary fences.

Northern Portion

As noted above, the wetland extends from the edge of the Shenango River west to the bottom of the slag pile along the northern portion of the site. In this area, the wetland appears to have been filled by the placement of the slag; thus the flagged area extends to the base of the slag pile.

Between approximately flags WA-1 and WA-6, herbaceous vegetation includes sensitive fern (*Onoclea sensibilis*), jewelweed (*Impatiens capensis*), poison ivy (*Toxicodendron radicans*), false nettle (*Boehmeria cylindrica*), and swamp buttercup (*Ranunculus septentrionalis*). The tree canopy includes sycamore (*Platanus occidentalis*) and ash (*Fraxinus* sp.). The adjacent upland consists of the slag pile. Herbaceous species on the pile include staghorn sumac (*Rhus typhina*), *Rubus* sp., and poison ivy, with a sycamore and quaking aspen (*Populus tremula*) tree canopy.

The area between flags WA-7 and WA-14 was the wettest area of the northern portion of the wetland. On the day of the site visit, this area included several inches of standing water. Herbaceous species noted in this area include skunk cabbage (*Symplocarpus foetidus*), jewelweed, late goldenrod (*Solidago gigantea*), false nettle and silky dogwood

(*Cornus amomum*) seedlings. The tree canopy is mostly comprised of ash. The adjacent upland, which extends up the side of the slag pile, includes black cherry (*Prunus serotina*) seedlings, poison ivy, and Christmas fern (*Polystichum acrosticoides*). The shrub and tree layers include witch hazel (*Hamamelis virginiana*) and beech (*Fagus grandifolia*), respectively.

Southern Portion

In the southern portion of the site, the slag pile veers to the west, away from the Shenango River. In this area, two streams (northern stream and southern stream) flow in an easterly direction across the Whittaker site and discharge into the river. The northern stream flows through a concrete culvert from underneath the slag pile and is surrounded by a level area (since the slag pile has veered to the west leaving an open area). The soils in this area were very sandy; however, the colors were not characteristic of hydric soils. No mottles were noted in the top 8 inches of the soil profile, and no dark vertical streaking was noted; therefore, the area was not flagged as wetland. The herbaceous vegetation in the area included poison ivy, gray birch (*Betula populifolia*), and late goldenrod, with a mix of sycamore, red or black oak (*Quercus* sp.), and white ash in the shrub and tree layers.

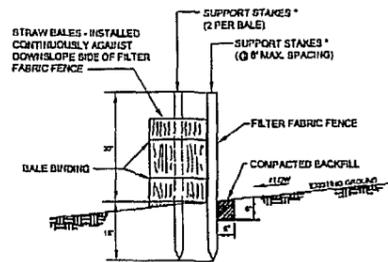
The level area between northern and southern stream contains an unusual soil and vegetation combination. In some areas, hydric soil characteristics were very obvious, while in others the soils were much brighter with no redoximorphic features. However, the herbaceous vegetation throughout this area includes skunk cabbage, false nettle, and poison ivy, with a tree canopy of ash. The area was conservatively flagged as wetland given the source of hydrology on three sides (northern stream, southern stream, Shenango River), interspersions of upland and wetland soils, and consistent dominance of wetland herbaceous vegetation.

The southern stream is adjacent to the bottom of the slag pile as it begins to extend east towards the river. Starting at flag WA-50, the flags follow the base of the pile along the southern stream and then south parallel to the river, while still following the base of the pile. The final flag, WA-58, was tied to the chain-link fence, which spans west to east from the bottom of the slag pile to the Shenango River and acts as the site boundary. As noted, above, the wetland continues to the south, outside of the property boundaries.

APPENDIX C

Figure C-1	Proposed Location of Silt Fencing
Figure C-2	Standard Construction Details
Figure C-3	Standard Construction Detail-Filter Fabric Fence Reinforced by Staked Straw Bales
Figure C-4	Standard Construction Detail-Super Filter Fabric Fence
Figure C-5	Standard Worksheet #4 Filter Fabric Fence with Straw Bale Backing
Figure C-6	Standard Worksheet #5 Super Filter Fabric Fence
Figure C-7	Standard Worksheet #7 Temporary and Permanent Stabilization Specifications

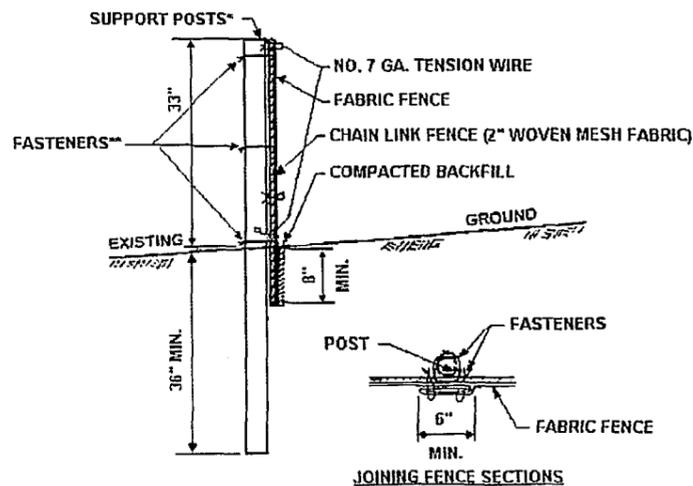
STANDARD CONSTRUCTION DETAIL #1
Filter Fabric Fence Reinforced by Staked Straw Bales



Filter fabric fence must be installed at existing level grade. Both ends of each fence section must be extended at least 8 feet upslope at 45 degrees to the main fence alignment.

Sediment must be removed where accumulations reach 1/2 the above ground height of the fence.

STANDARD CONSTRUCTION DETAIL #2
Super Filter Fabric Fence



* Posts spaced @ 10' max. Use 2 1/2" dia. galvanized or aluminum posts.

** Chain Link To Post Fasteners spaced @ 14" max. Use No. 6 Ga. aluminum wire or No. 9 galvanized steel pre-formed clips. Chain Link To Tension Wire Fasteners spaced @ 60" max. Use No. 10 Ga. galvanized steel wire. Fabric To Chain Fasteners spaced @ 24" max. C to C.

No. 7 Ga. Tension Wire installed horizontally at top and bottom of chain link fence.

Filter Fabric Fence must be placed at existing level grade. Both ends of the barrier must be extended at least 8 feet upslope at 45 degrees to main barrier alignment.

Sediment must be removed when accumulations reach 1/2 the above ground height of the fence.

TABLE 1 - PROJECT SEQUENCE

1	Site mobilization and surface clearing
2	Installation of sediment controls
3	Excavation and staging of waste materials
4	Transportation of waste materials to off-site disposal location
5	Site stabilization
6	Temporary demobilization
7	Site mobilization
8	Completion of excavations and disposals
9	Final site stabilization (part of Phase 3 site closure) - final grading, topsoil cover and seeding
10	Removal of sediment controls
11	Final demobilization

Note: Vegetated areas shall be considered permanently stabilized when a uniform 70% vegetative cover of erosion resistant perennial species has been achieved, or the disturbed area is covered with an acceptable BMP that permanently minimizes accelerated erosion and sedimentation.

TABLE 2 - INSPECTION SCHEDULE

ROUTINE INSPECTION SCHEDULE	
Weekly	Walk down all silt fencing at the beginning of the work shift.
After rain events	Walk down all silt fencing; inspect slopes for washouts, gullies, or significant erosion.
Prior to demobilization	Walk down all silt fencing; inspect site stabilization.
DURING DEMOBILIZATION PERIODS	
Monthly and after significant rain events and snow melts	Walk down all silt fencing; inspect slopes for washouts, gullies, or significant erosion; inspect site stabilization.

Note: Supplies to repair silt fence should be available on-site at all times. Repairs to silt fencing should be completed by the end of the work shift/day.

TABLE 3 - MATERIAL APPLICATION RATES

Material Type	Application Rate (Min.)			Notes
	Per Acre	Per 1,000 ft ²	Per 1,000 yd ²	
Straw	3 tons	140 lbs.	1,240 lbs.	Either wheat or oat straw, free of weeds, not chopped or finely broken
Hay	3 tons	140 lbs.	1,240 lbs.	Timothy, mixed clover and timothy or other native forage grasses
Wood Cellulose	1,500 lbs.	35 lbs.	310 lbs.	Do not use alone in winter, during hot and dry weather or on steep slopes (≥ 3:1)
Wood Cellulose	1,000 lbs.	25 lbs.	210 lbs.	When used over straw or hay
Wood Chips	4 - 6 tons	185 - 275 lbs.	1,650 - 2,500 lbs.	May prevent germination of grasses and legumes
Slag	Apply a layer not less than 1-foot thick.			

Instructions for Sediment Removal: Remove organic material from the base of the silt fence. Using a shovel, remove sediments and place them in a waste container. Contact the project health physicist for sampling protocols and radiological release criteria. Radiologically clean sediments can be placed on-site. Contaminated sediments must be disposed of as low-level radioactive waste.

Instructions for Waste Disposal: All material, including used silt fence, stakes, fence posts, etc., must be surveyed for radioactive contamination prior to release from the site as clean for recycle or disposal. Contact the project health physicist for survey protocols and radiological release criteria. Radiologically clean waste can be disposed of with sanitary garbage. Contaminated materials must be disposed of as low-level radioactive waste.

DOCUMENT CONTROL NO.

B2A9619

REVISION NO.

WHITTAKER PROPERTY
PYSMATUNING TWP., MERCER CO., PA
STANDARD CONSTRUCTION DETAILS

PROJECT

DRAWING

ENERGY SOLUTIONS

THE BLEACHERY
143 WEST STREET
NEW MILFORD, CT. 06776
(860) 210-3000

PROJECT NO.: 2501-100

FILE NAME: 2501-100

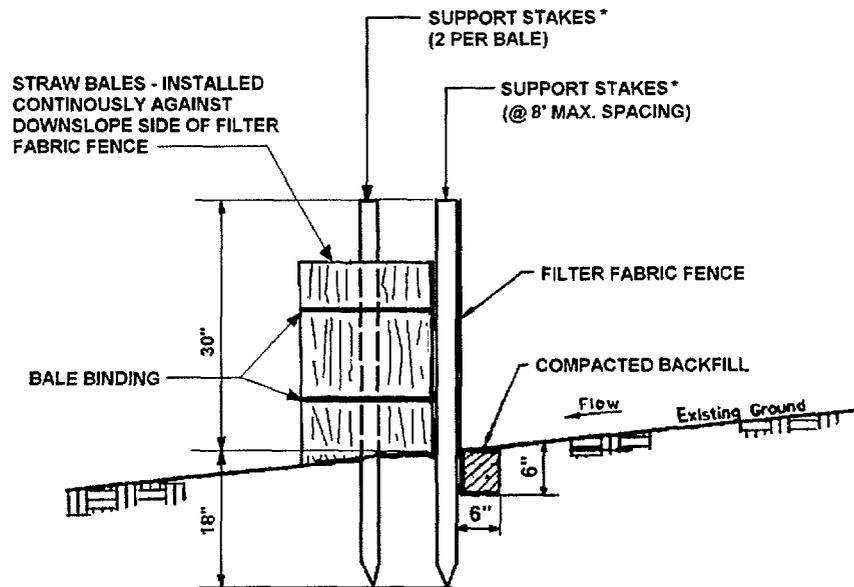
SCALE: N.T.S. DATE: 05/18/04

BY: DT CK

FIGURE #

C-2

**FIGURE C-3
STANDARD CONSTRUCTION DETAIL
Filter Fabric Fence Reinforced by Staked Straw Bales**

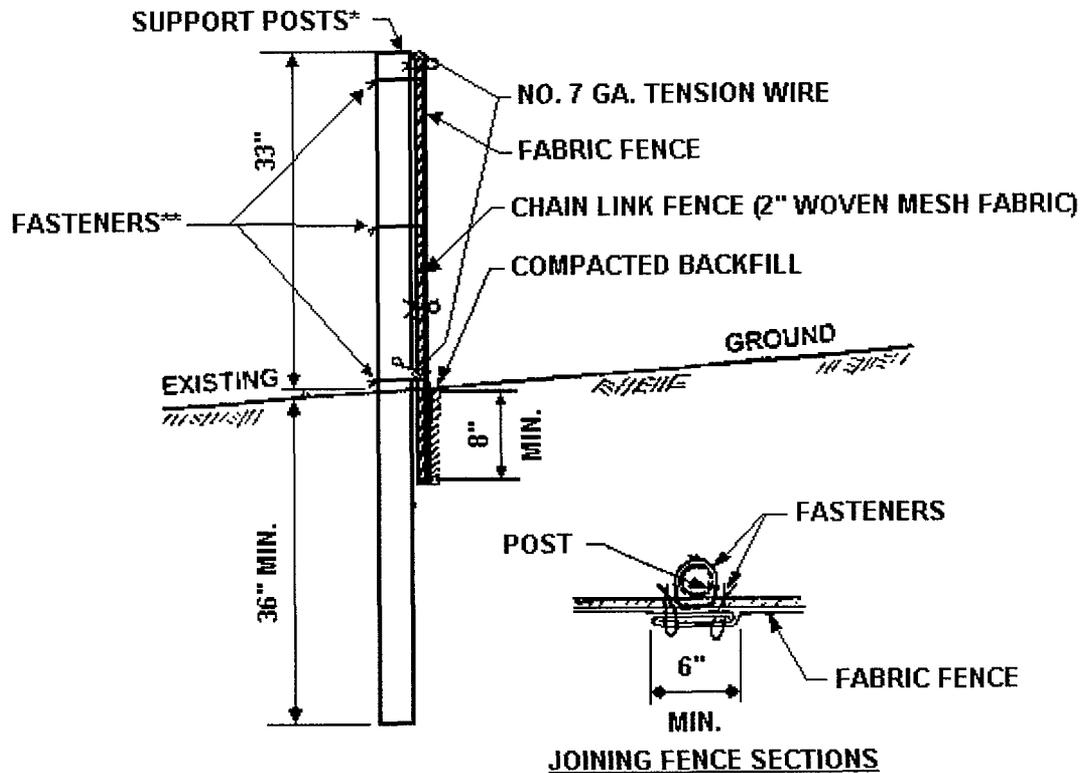


*USE 2" X 2" WOOD OR EQUIVALENT STEEL STAKES.

Filter fabric fence must be installed at existing level grade. Both ends of each fence section must be extended at least 8 feet upslope at 45 degrees to the main fence alignment.

Sediment must be removed where accumulations reach 1/2 the above ground height of the fence.

FIGURE C-4
STANDARD CONSTRUCTION DETAIL
Super Filter Fabric Fence



* Posts spaced @ 10' max. Use 2 1/2" dia. galvanized or aluminum posts.

** Chain Link To Post Fasteners spaced @ 14" max. Use No. 6 Ga. aluminum wire or No. 9 galvanized steel pre-formed clips. Chain Link To Tension Wire Fasteners spaced @ 60" max. Use No. 10 Ga. galvanized steel wire. Fabric To Chain Fasteners spaced @ 24" max. C to C.

No. 7 Ga. Tension Wire installed horizontally at top and bottom of chain-link fence.

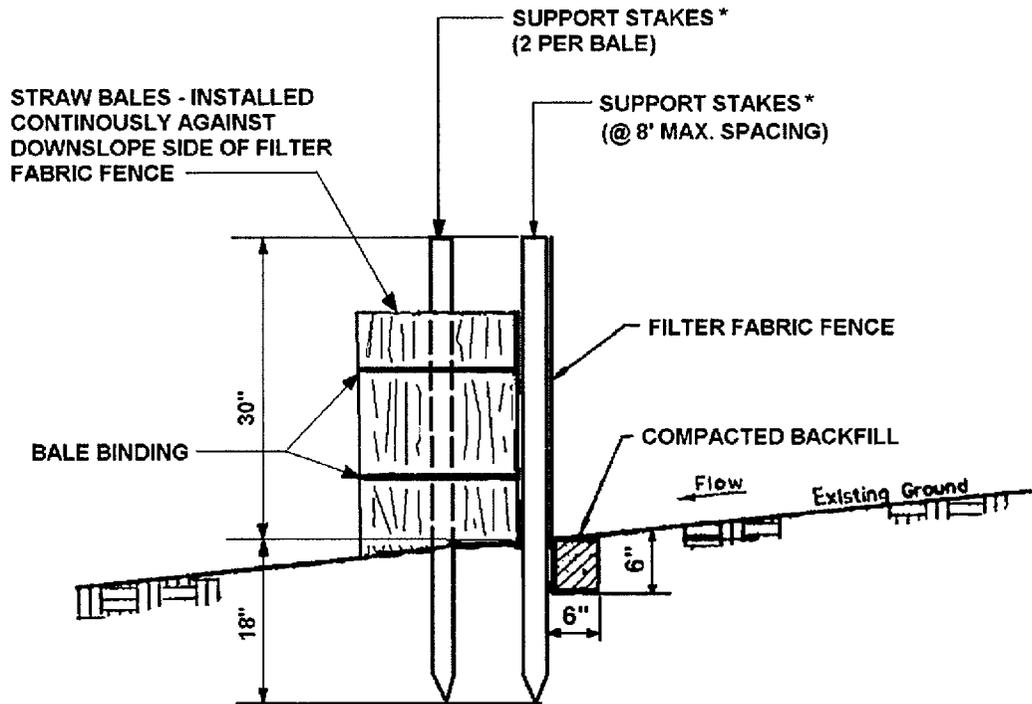
Filter Fabric Fence must be placed at existing level grade. Both ends of the barrier must be extended at least 8 feet upslope at 45 degrees to main barrier alignment.

Sediment must be removed when accumulations reach 1/2 the above ground height of the fence.

**FIGURE C-5
STANDARD WORKSHEET #4
Filter Fabric Fence With Straw Bale Backing**

PROJECT NAME: Whittaker Site Remediation
 LOCATION: Reynolds Industrial Park, Transfer, Mercer County, PA
 PREPARED BY: Kevin E. Taylor DATE: May 19, 2004
 CHECKED BY: Mark Nicholson DATE: May 19, 2004

CONSTRUCTION DETAIL:



***USE 2" X 2" WOOD OR EQUIVALENT STEEL STAKES.**

Filter fabric fence must be installed at existing level grade. Both ends of each fence section must be extended at least 8 feet upslope at 45 degrees to the main fence alignment.

Sediment must be removed where accumulations reach 1/2 the above ground height of the fence.

Any fence section which has been undermined or topped must be immediately replaced with a rock filter outlet. See Rock Filter Outlet Detail.

BARRIER NO.	LOCATION (See Figure A-2)	SLOPE-PERCENT	SLOPE LENGTH ABOVE BARRIER (FT)
1	Sections 1 and 2 – northern half of site	50% max.	20 ft minimum
2	Sections 2 and 4 – north of creek	38% max.	20 ft minimum
3	Section 1 – south of creek	36% max.	35 ft minimum

**FIGURE C-7
STANDARD WORKSHEET #7
Temporary and Permanent Stabilization Specifications**

PROJECT NAME: Whittaker Site Remediation
 LOCATION: Reynolds Industrial Park, Transfer, Mercer County, PA
 PREPARED BY: Kevin E. Taylor DATE: May 18, 2004
 CHECKED BY: Mark Nicholson DATE: May 18, 2004

SPECIFICATIONS: The Department recommends the use of the Penn State publication "EROSION CONTROL & Conservation Plantings on Noncropland" as the standard to use for the selection of species, seed specifications, mixtures, liming and fertilizing, time of seeding, and seeding methods. Specifications for these items may also be obtained from Penn DOT's Publication # 408, Section 804 or by contacting the applicable county conservation district. Upon selection of a reference, that reference must be used to provide all specifications for seeding, mulching, and soil amendments. The following specification will be used for this project:

(TEMPORARY) SPECIES: NA
 % PURE LIVE SEED: NA %
 APPLICATION RATE: NA LB./ACRE
 FERTILIZER TYPE: NA (X-X-X)
 FERTILIZER APPL. RATE: NA LB./ACRE
 LIMING RATE: NA T./ACRE
 MULCH TYPE: Hay
 MULCHING RATE: 3 T./ACRE
 SOLID MATERIAL TYPE: Slag
 MATERIAL LAYER THICKNESS: 1 FOOT

(PERMANENT) SPECIES: TBD
 % PURE LIVE SEED: _____ %
 APPLICATION RATE: _____ LB./ACRE
 FERTILIZER TYPE: _____ (X-X-X)
 FERTILIZER APPL. RATE: _____ LB./ACRE
 LIMING RATE: _____ T./ACRE
 MULCH TYPE: _____
 MULCHING RATE: _____ T./ACRE
 ANCHOR MATERIAL: _____
 ANCHORING METHOD: _____
 RATE OF ANCHOR MATERIAL APPL.: _____ LB./ACRE
 SEEDING SEASON DATES: _____

To be determined during Phase
3 – Site Closure.

(PERMANENT – STEEP SLOPE) SPECIES: TBD
 % PURE LIVE SEED: _____ %
 APPLICATION RATE: _____ LB./ACRE
 FERTILIZER TYPE: _____ (X-X-X)
 FERTILIZER APPL. RATE: _____ LB./ACRE
 LIMING RATE: _____ T./ACRE
 MULCH TYPE: _____
 MULCHING RATE: _____ T./ACRE
 ANCHOR MATERIAL: _____
 ANCHORING METHOD: _____
 RATE OF ANCHOR MATERIAL APPL.: _____ LB./ACRE
 SEEDING SEASON DATES: _____

To be determined during Phase
3 – Site Closure.

This is to acknowledge the receipt of your letter/application dated

5/24/2006, and to inform you that the initial processing which includes an administrative review has been performed.

Adm. SRA-1018 There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 138908.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.