

Docket-040-07604



**BP CHEMICALS**

BP Chemicals Inc  
Ft. Amanda Road  
P.O. Box 628  
Lima, Ohio 45802-0628  
(419) 226-1200

**VIA OVERNIGHT MAIL**

Mr. Jim Ottarson  
Ohio Environmental Protection Agency  
Northwest District Office  
347 North Dunbridge Road  
Bowling Green, Ohio 43402

March 2, 1999

Subject: Report of Construction and Testing of Test Fill No. 3

Dear Mr. Ottarson:

On October 2, 1998, BP Chemicals, Inc. (BPCI) submitted a revised work plan for the construction and testing of Test Fill No. 3. This work plan was designed to demonstrate the suitability of gray clay removed from Burn and Deepwell Ponds for use as liner material for Mixed Waste Pond Closure Cell No. 2. Following approval of the work plan by Ohio EPA the test fill was constructed and in situ permeability testing was conducted. Attached is a report prepared by our soil testing contractor, Bowser-Morner, documenting the construction of the test fill and the results of the in situ and associated laboratory testing of the gray clay. Also attached is a letter dated March 1, 1999 from the certification engineer, Robert Blickwedehl of Dames & Moore, summarizing his review of the Bowser Morner work and the results achieved.

The attached report and the Dames & Moore letter conclude that the gray clay is acceptable for used when installed as specified in the Test Fill No. 3 Report. Therefore, Ohio EPA approval of the Test Fill No. 3 Report is requested.

Since the start of the 1999 construction season is upcoming, prompt Ohio EPA approval of the attached report as well as approval of the previously submitted Mixed Waste Pond Closure Plan Modification have become critical path steps to our resumption of site remediation activities. This is especially true since the receipt of NRC release of Burn and Deepwell Ponds for cell construction on February 8, 1999 and NRC approval of the Cell No. 2 expansion and SWMU 102 / AN-1 Area remediation on February 24, 1999. Therefore, if there is anything we can do to accelerate the Ohio EPA's review and approval process (such as holding a meeting at your office with our engineer and contractor present to answer any questions), please let me know.

If there are any questions, please give me a call at (419) 226-1299.

Sincerely,

William M. Rupert  
Project Regulatory Specialist

9903120157 990302  
PDR ADDCK 04007604  
B PDR

cc: Sam Nalluswami, NRC  
Ed Kulzer, NRC Region 3  
Ruth Vandegrift, Ohio Dept. of Health



DAMES & MOORE

A DAMES & MOORE GROUP COMPANY

3065 Southwestern Boulevard  
Suite 202  
Orchard Park, New York 14127  
716 675 7130 Tel  
716 675 7136 Fax

March 1, 1999

BP Chemicals, Inc.  
Ft. Amanda Road  
Lima, OH 45803-0628

Att: Mr. William M. Rupert, P.E.  
Technical Specialist, Environmental

Re: Use of Gray Cohesive Soil from Deepwell/Burn Pond Excavation for Liner Construction  
Mixed Waste Pond Closure Project  
BP Chemicals, Inc.  
Lima, Ohio

Dear Mr. Rupert:

We have reviewed the below referenced Bowser-Morner report pertaining to the performance of the gray cohesive soil excavated from the Deepwell and Burn Ponds as liner material. The results of Test Pad No. 3 confirm that this material will meet or exceed the project specifications when the material is placed and compacted in accordance with the procedures used to construct Test Fill No. 3. These are:

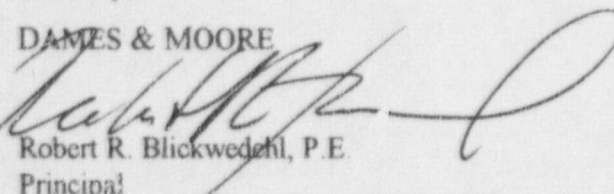
- Placement in lifts approximately 8 inches in loose thickness as determined by visual examination
- Compaction with at least 10 passes of a CATCP433C vibratory sheepsfoot roller with the vibrator operating and a travel speed of approximately 6 to 7 feet per second.
- Control of moisture to meet specifications and assure a density of at least 90% of the optimum density determined by the Modified Proctor Method.

In consideration of these results, it is our opinion that this material can satisfactorily be used for construction of the liner for Cell 2 to meet the specifications set forth in the Closure Plan. We also believe that this material will meet or exceed the Closure Plan requirements for backfill in other areas to be remediated as long as it is placed in accordance with project specifications for that purpose.

If you have any questions regarding this letter, please contact me.

Sincerely,

DAMES & MOORE

  
Robert R. Blickwedahl, P.E.  
Principal

BUF-99-002

Offices Worldwide





# DAMES & MOORE

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BP Chemicals, Inc

03/01/99

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References: Test Pad No. 3 Construction and Testing for the BP Chemicals Mixed Waste Closure Project, for BP Chemicals Inc., Amanda & Adgate Roads, Lima, OH 45804, Bowser-Morner Report No. 114409-0299-046, February 25, 1999.

cc:	Mr. L. Vonderembse	-- BPCI
	Mr. R. Hajer	-- Dames & Moore
	Mr. G. Armstrong	-- Dames & Moore



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3065 Southwestern Boulevard  
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March 1, 1999

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Ft. Amanda Road  
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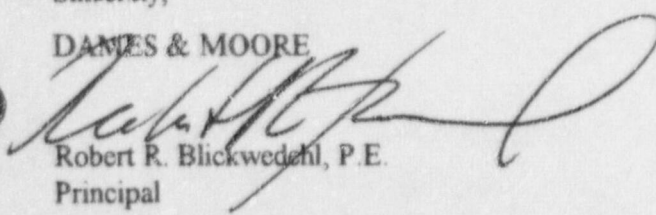
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