



State of Ohio Environmental Protection Agency
Southwest District

8241

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357
FAX: (937) 285-6249

June 30, 2003

Mr. Johnny Reising
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, OH 45329-8705

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RE: OU1 PROPOSED PLAN FOR ROD AMENDMENT

Dear Mr. Reising:

Ohio EPA has reviewed DOE's April 30, 2003 submittal "Transmittal of the Proposed Plan for an Amendment to the Operable Unit 1 Record of Decision." Ohio EPA's comments on the document are attached.

If there are 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, Fluor Daniel Fernald
Michelle Cullerton, Tetra Tech EM Inc.
Ruth Vandegrift, ODH
Mark Schupe, HSI Geotrans



Mr. Johnny Reising
June 30, 03
Page 2

Comment: The section should go into more detail regarding the intent of the "cover system" as developed in the OU1 FS/PP and ROD. This detail is necessary to help the reader understand the extent of the change being proposed. The reader needs to understand if the ROD intent was a cover as in landfill cover or cover as in topsoil and seeding. It will likely be necessary to have some topsoil cover placed in the waste pit area to facilitate restoration. This should be included in the last paragraph.

5. Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: Readers note

Pg #: 5

Line #:

Code: c

Comment: This paragraph is confusing. We think the main point is that this is the last time that the DOE thinks it will be necessary to change a soil FRL established in one of the RODs. We suggest re-writing this note and slightly change the emphasis so that it is clear that no more changes to FRLs are anticipated. Briefly list the previous changes, including changes to the groundwater FRLs. Conclude with a strong statement promising that no more changes will be made. We offer this suggestion because we are concerned that the stakeholders will feel that the remedy has been nickle and dimed to the point that it is no longer protective to the extent it was in the original RODs.