

595

18  
5-408.25

**CONDITIONAL APPROVAL RESTORATION AREA PSP**

**02/28/97**

**OEPA            DOE-FEMP**  
**2**  
**COMMENTS**



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street  
Dayton, Ohio 45402-2911  
(513) 285-6357  
FAX (513) 285-6249

K-1053  
5 27 11 1997

Voinovich

February 28, 1997

RE: DOE F  
MSL 5  
HAMIL  
CONDI  
RESTO

595

595

Mr. Johnny Reising  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

Dear Mr. Reising:

The Ohio EPA has reviewed the Draft Final Restoration Area Verific  
Project Specific Plan Rev. C and the Response to Comments. The ap  
satisfactory and consistent with the conclusions reached during the December 19, 1996 meeting.  
The Ohio EPA conditionally approves this document contingent on the satisfactory resolution of  
our remaining concerns about the FRL for lead.

5-408.25

Ohio EPA still has reservations with changing the lead FRL from the 0.002 mg/L in the OU5  
ROD to the SDWA action level of 0.015 mg/L. We agree that the background value was arrived  
at in an error that was overlooked by all parties and that defaulting to back ground was not  
appropriate in this case. What is at issue is the appropriateness of the SDWA action level. As  
this submittal alluded, the lead action level is a special case. It is the only drinking water  
standard that is NOT an MCL. It is the only drinking water standard whose compliance is  
measured at the consumers' tap rather than at the water treatment system. Furthermore, the  
action level was determined by considering a combination of risk-based and technology-based  
methodology. We also agree that there is a certain amount of disagreement over the reference  
dose for lead, but we suggest that there is currently abundant data to derive risk-based remedial  
levels for lead. We suggest that DOE calculate an FRL for lead in the GMA using a target blood  
lead level in conjunction with a biokinetic slope factor (BKSF). Two documents that may assist  
DOE in this risk assessment include: 1) Integrated Exposure Uptake Biokinetic Model (IEUBK)  
for Lead in Children, Publication 9285.7-15-1, U.S. EPA, February, 1994 and 2)  
Recommendations of the Technical Review Workgroup for Lead for an Interim Approach to  
Assessing Risks Associated with Adult Exposures to Lead in Soil, U.S. EPA, December, 1996.  
The U.S. EPA has recommended that the IEUBK Model for Lead in Children be used for  
assessing residential lead risks. The IEUBK Model considers lead uptake by routes in addition.

DFRAVPSP.LTT

(Janka(RJ)  
Partial  
Action response  
to DOE-0425-97  
(10244)

Mr. Johnny Reising  
February 28, 1997  
Page2

to drinking water and is considered adequately conservative.

If you have any questions, please contact Tom Ontko or me.

Sincerely,

A handwritten signature in cursive script that reads "Tom Ontko".

Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA  
Terry Hagen, FERMCO  
Ruth Vandergrift, ODH  
Mike Proffitt, DD&GW  
Bob Geiger, PRC  
Manager, TPSS/DERR,CO  
Dave Ward, GeoTrans