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REPLY TO THE ATTENTION OF:

AUG 12 1997

Mr. Johnny W. Reising
 United States Department of Energy
 Feed Materials Production Center
 P.O. Box 398705
 Cincinnati, Ohio 45239-8705

SRF-5J

RE: Area 1, Phase 1
 Certification Report

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Area 1, Phase 1 certification report.

The purpose of the certification report is to provide data to support conclusions that Area 1, Phase 1 has been remediated to obtain final remediation levels.

The certification report does not clearly illustrate the Area 1, Phase 1 boundaries, and the certification unit changes that have occurred in Area 1, Phase 1 as the report was developed. Also, the report has numerous data reporting errors in the summary tables presented in Appendix A. U.S. EPA has attached its comments on the certification report.

Therefore, U.S. EPA disapproves the Area 1, Phase 1 certification report. U.S. DOE must submit responses to comments and a revised document within thirty (30) days receipt of this letter.

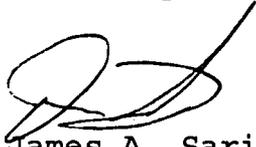
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 to DOE-1170-97
 (10586)



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Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,



James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: Appendix A-C Page #: All Line #: All
 Original General Comment #: 4

Comment: The tables appear to have numerous errors, including missing data, incorrect values (0.01 to 0.3 concentration variations from the correct values), and unsupported data. The missing data include a value for total uranium in sample O20HS-1-R-13 (see Original Specific Comment 20). Incorrect data entries were noted in Appendix A in the data tables for the primary ASCOCs (see Original Specific Comment 21). The unsupported data include the data summaries for cesium-137 and thorium-230 (see Original Specific Comment 18). The data tables should be checked and revised to report all data accurately.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: Appendix F Page #: All Line #: NA
 Original General Comment #: 5

Comment: Appendix F contains on-site disposal cell sediment basin certification results. However, no data summary tables, figures, or other supporting documentation is provided for these results. Supporting documentation such as data summary tables or figures should be provided.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: 3 Page #: Table 3-1 Line #: NA
 Original Specific Comment #: 1

Comment: The text states that "the volumes for the AlPI sediment traps do not include soil in the berms." It is important to document the source of the soil used to construct the berms in order to reduce the potential for recontamination of the area. A figure should be provided to show the locations of the berms, and the text should be revised to identify the source of the soil used to construct the berms.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: 4.1.2 Page #: 4-3 Line #: 14
 Original Specific Comment #: 2

Comment: The text indicates that the results for thorium-232 analyses of the certification samples by gamma spectrometry generally exceed the alpha spectrometry results for the same radionuclide in the same samples. This difference in analytical results can affect the decision as to whether certain CUs exceed the FRL for thorium-232. The proposed use of soil-specific radiological standards as calibration standards or check standards will be useful in addressing this problem. However, one useful principle is not

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 5 Page #: Figures 5-10, 5-11, 5-12, and 5-13 Line #: NA
Original Specific Comment #: 16

Comment: The figures provide the total uranium concentrations for separate sampling depth intervals and the hot spot excavation depths for CU 020. The figures are currently somewhat unclear. To clarify the figures, they should be revised to show all the sampling locations and their corresponding numbers.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Appendix A Page #: Data Tables Line #: NA
Original Specific Comment #: 17

Comment: The data tables in Appendix A present the concentrations of contaminants of concern detected at the site. However, no units of measure are listed in the tables. The tables should be revised to include the units of measure for each of the concentrations listed.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Appendix A Page #: Data Tables Line #: NA
Original Specific Comment #: 18

Comment: The data tables in Appendix A include data summaries for samples analyzed for cesium-137 and thorium-230. Appendixes B and C do not provide such summaries for CU N19. The document should include supporting data for all the tables in Appendix A.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Appendix A Page #: 020 Primary Rad Map Line #: NA
Original Specific Comment #: 19

Comment: The figure labels the new and original data points sequentially from 1 through 19. These labels do not correlate with Figure 5-14, where the data points are labeled as original sampling points 1 through 12 and new sampling points 1 through 7. The figures should label the data points identically.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Appendix A Page #: Data Table CU020 Line #: NA
Original Specific Comment #: 20

Comment: The data table for CU 020 summarizes the total uranium data. This table omits a value for total uranium in sample O20HS-1-R-13. The table should be revised to include this information.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Appendix A Page #: Data Tables Line #: NA
Original Specific Comment #: 21

Comment: These data tables are not entirely consistent with the data summaries in Appendix B. For example, the table for CU P17-22 indicates that radium-226 was measured at 2.66 picocuries per gram (pCi/g) and radium-228 was measured at 2.61 pCi/g in sample P17-22C2-R-2. However, the data summaries indicate that the concentrations of radium-226 and radium-228 in sample P17-22C2-R-2 were 1.33 and 1.31 pCi/g, respectively. The data tables in Appendix A and data summaries in Appendix B should be compared, and all such inconsistencies should be resolved.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Appendix A Page #: Q19-30 Primary Rad Map Line #: NA
Original Specific Comment #: 22

Comment: Sampling location 5 is not depicted in the figure. The figure should be revised to show this data point.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Appendix A Page #: A1P1ST-1 Metals Map Line #: NA
Original Specific Comment #: 23

Comment: The figure contains an unlabeled data point. The figure should be revised to label this data point.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Appendix A Page #: NAR-1 Metals Map Line #: NA
Original Specific Comment #: 24

Comment: The figure contains a data point with two location numbers, 14 and 16. The figure should be revised to display only the single, discrete label for this point.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Appendix A Page #: NAR-1 PCBs Map Line #: NA
Original Specific Comment #: 25

Comment: The figure contains a data point with two location numbers, 14 and 16. The figure should be revised to display only the single, discrete label for this point.