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September 3, 1997

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

FILE: 9500
RE: DOE FEMP
COMMENTS: AREA 1
PHASE I CERTIFICATION
REPORT

Dear Mr. Reising:

This letter provides as an attachment Ohio EPA's comments on the "Area 1 Phase I Certification Report" as transmitted with your letter DOE_1140-97. Ohio EPA comments to the "Waste Acceptance Criteria Attainment Completion Reports for the East and West Soil Stockpiles Generated during Area 1 Phase I Activities" will be transmitted in the near future.

We are compelled to disagree with the conclusion in the Executive Summary (page ES-2 line 28) "A1PI can be released for final land use". We base this on the presence of unexcavated roads, ditches and sediment basins.

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

Sincerely,

for

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

- cc: Jim Saric, U.S. EPA
- Terry Hagen, FDF
- Ruth Vandergrift, ODH
- Dave Ward, HSI GeoTrans
- Francie Barker, Tetra Tech EM Inc.
Manager, TPSS/DERR, CO

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**Ohio Environmental Protection Agency Comments on the
Area 1 Phase I Certification Report**

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code: M
Original Comment #:
Comment: The Ohio EPA will not concur that an area is certified prior to the work actually being completed. Specifically, excavations in the areas of the North Access Road and the adjacent ditches are deferred to the future. The Ohio EPA does not intend to certify areas as remediated until all activities have been completed.
- 2) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1 Pg #: 1-2 Line #: 9 Code: c
Original Comment #:
Comment: Figure 1-2 is not sufficiently illustrative to delineate areas that have actually been excavated from areas that have not been excavated. Figure 1-2 appears to have been 'lifted' straight out of the OU5 RI/FS. Replace this figure with a figure showing the CUs, the areas excavated and the areas where excavation was not performed.
- 3) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1 Pg #: Figure 1-1 Line #: Code: c
Original Comment #:
Comment: This Figure should be revised to show the new Remediation Area 8 west of Paddy's Run Creek.
- 4) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2 Pg #: 2-9 Line #: 14 Code: c
Original Comment #:
Comment: We agree that it is preferable to sample for primary and secondary COCs from the same locations. We expect that in the future, the CUs for both primary and secondary CUs will be collocated.
- 5) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2 Pg #: 2-9 Line #: 18 Code: c
Original Comment #:
Comment: The discussion of 'weighting' factors is unclear. However, we do agree that the statistical approach used is appropriate and that the use of weighting factors should be avoided.
- 6) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.4 Pg #: 3-2 Line #: Code:
Original Comment #:
Comment: The discussion in this section is appropriate and helpful. Please include a similar

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discussion with future certification reports.

Ohio EPA has previously asked for additional information on the areal extent of soil excavations. We would like to see a calculation that compares the volume of soil actually in the piles to the volume of soil calculated using the number of acres excavated in a nominal 6 inch lift. (Of course, a 'fluff' factor will be required to compare the bank volume with the pile volume.) For example, the Executive Summary states that 59 acres were excavated.

$(59 \text{ acres} \times 43,560 \text{ ft}^2/\text{acre} \times 0.5 \text{ ft depth}) / (27 \text{ ft}^3/\text{yd}^3) = 47,600 \text{ yds}^3$ excavated
 $47,600 \text{ yds}^3 + 10\% \text{ fluff factor} = 50,000 \text{ yds}^3$ more or less

This is somewhat more than the 37,400 yds³ quoted in Table 3-1. Since the debris piles total less than 1000 yds³, their additional volumes do not help very much to reconcile the difference.

- 7) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.1.2 Pg #: 4.2 Line #: Code: c
 Original Comment #:
 Comment: There are several unresolved issues relating to the analytical procedures for radioactive COCs.
1. The Ohio EPA has not received the letter report (page 4-3 line 6) detailing the discrepancies between alpha spectroscopy and gamma spectroscopy methods for the analysis of thorium-232.
 2. This is the first mention that we recall of a site-specific Th-232 standard for soils. We have discussed a soil standard for technetium-99 and we are optimistic that this standard will be valuable in assessing the significance of any analytical discrepancies between split soil samples.
 3. The document does not provide a mechanism to effect closure on any of these issues or a way to track progress. Please suggest a way to keep the regulators apprised of the evolving status of these procedures.
- 8) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.3 Pg #: 4-7 Line #: 18 Code: c
 Original Comment #:
 Comment: The Ohio EPA considers that duplicate samples are most useful as a check of sampling and lab errors. We believe that it is more appropriate to report the original sample concentration than it is to average the original and the duplicate.
- 9) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Appendix E Pg #: 72 Line #: Code:
 Original Comment #: 26, comment # 249

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Comment: The original comment suggested the use of a riffle splitter and the response adequately addressed our concerns. However the response also brings to mind outstanding issues with the potential volatilization of technetium during the sample drying step. These potential problems first came to light during split sampling performed for WAC attainment in Area 2, Phase I. Concerns such as these will be better addressed during the regulators review of the Site-Wide CERCLA Quality Assurance Plan (SCQ).