



State of Ohio Environmental Protection Agency

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FERNALD

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George V. Voinovich
Governor

December 4, 1997

RE: DOE FEMP
COMMENTS: OFF-PROPERTY
SOIL CERTIFICATION AND
AMENDMENT OF RD WORK
PLAN

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

Dear Mr. Reising:

This letter provides Ohio Environmental Protection Agency comments on your letter (DOE-0054-98) "Proposed Certification Strategy for Eastern Off-Property Area (Mr. Summe's Property) and Proposal to Amend Operable Unit 5 remedial Design Work plan to Outline Overall Off-Property Certification Strategy and Schedule."

1. The letter states "Any necessary excavations based on surface scan results will be conducted during the pre-certification phase in order to remove contamination above the FRLs." However, a USEPA enclosure titled "Requirements for certification of new analytical methods" that was hand-delivered during the real-time gamma methods work group meeting held at the FEMP on November 20, 1997, requires that "final decisions on the remediation of target areas" be supported by ASL D methods. None of the real-time gamma spectroscopy methods are likely to be certified at ASL D by the time of the remediation of the Summe property. Excavation decisions made using real-time methods must be verified by discrete samples and traditional laboratory analyses until real-time gamma methods are approved.
2. The letter provides a schedule for remediation of the northern half of the Summe property (FY 1998) and the southern half (within one year of the certification of Area 1 Phase II, which is scheduled for June 1998), but no schedule is provided for the other off-property areas or for submittal of a draft amended RDWP. We agree that a schedule for the submittal of the Certification Design Letters should be included in the amended OU5 RDWP. However, we suggest that the strategy for off-property remediation and certification would be more appropriately handled within the scope of the Site-wide Excavation Plan.
3. We agree with the proposed three or four phase certification process but wish to re-iterate

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our concerns about the 'informal' review of the Project-Specific Plans for pre-certification.

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

Sincerely,

for Tom Ontko

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

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