



State of Ohio Environmental Protection Agency

Southwest District Office

FERNALD

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George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

January 7, 1998

RE: DOE FEMP
CONDITIONAL APPROVAL:
CERTIFICATION DESIGN LETTER
AREA 1 PHASE II SECTOR 1Mr. 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's conditional approval of the December 30, 1997, Revision B of the Certification Design Letter for Area 1 Phase II Sector 1 as amended based our January 6, 1998 conference call and shown in FDF's January 7, 1998 fax. The conditions for approval are acceptable resolution of the attached comments. Approval is granted for the initiation of sampling activities. Please provide notification and schedule information to Ohio EPA regarding sampling.

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

Sincerely,

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

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Ohio Environmental Protection Agency Comments on the
Area I Phase II, Sector 1 Certification Design Letter

General Comments

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: Line #: Code: general
 Comment: These comments reflect our review of the original Certification Design Letter (Revision A), and Revision B and also changes to the CUs which were discussed in a telephone call on January 6, 1998. The changes to certification units A1PII-S1-01 through S1-08 were faxed to us on January 7, 1998. The area originally designated as by these eight CUs was changed to encompass 10 new CUs of different configuration. A revised map including sampling locations for the CUs should be provided to Ohio EPA.

- 2) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: Line #: Code: general
 Comment: There remain several conceptual problems with the 'certification for reuse' concept. These problems especially center around the sediment retention basins which will be an element of all of the remediation areas but it applies to any area where potential re-contamination may occur. In Area I Phase I, for example, the entire area was certified as clean and then sediment basins were installed to contain contaminated run-off from the area during remediation. The Ohio EPA will not concur with certification of a given area if future plans for that area place it at risk of re-contamination.
 Our proposed solution is to concur with the certification of a given area except for that part of the area where 'certification for re-use' concept is planned. The Ohio EPA would not concur with the certification of the sedimentation basin until its footprint were remediated at some future time. This solution makes it necessary to design the individual certification units around the proposed location of the sedimentation basin. These changes were incorporated into the re-configured certification units that were faxed to us on January 7, 1998. Ohio EPA recommends incorporation of this issue into revision of the Sitewide Excavation Plan.

- 3) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: Line #: Code: general
 Comment: The Ohio EPA disagrees with the strategy to analyze 12 of the 16 soil samples from each certification unit and to archive 4 samples for future analysis if needed. We do not view the potential cost saving to be significant compared to the potential schedule impacts if the Borrow Area can not be utilized as planned for the OSDF construction. Past experience with the Area I Phase I project and the long turn around time for radium-226 tend to support our position. During the 1/6/98 conference call, DOE agreed to analyze 16 samples for all CUs north of and including S1-08 thru S1-11 to adequately address Ohio EPA's concern.

- 4) Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
 Section #: 1.0 Pg. #: 1-1 Line # 38 Code: C

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Comment: The term "Group A CUs" should be defined. How are they differentiated from Group B CUs mentioned in Paragraph 1, Page 1-2?

- 5) Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
Section #: 1.0 Pg. #: 1-2 Line # 3 Code: C
Comment: The text suggests that Group B CUs include the Trap Range. What other CUs are included in this group? How is it differentiated from Group A discussed on the preceding page?
- 6) Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
Section #: 1.0 Pg. #: 1-2 Lines # 23-25 Code: C
Comment: The language used in this sentence is unclear. It states that the conveyance ditch will be "characterized" then used as a source of fill for OSDF construction needs. It is unclear why it is not stated that the conveyance ditch CU will be certified prior to its use for borrow materials.
- 7) Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
Section #: 2.0 Pg. #: 5 Line # 3 Code: C
Comment: The text should clarify if the sample exhibiting matrix interferences was or was not from any portion of Area 1 Phase II Sector 1.
- 8) Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
Section #: 2.0 Pg. #: 2-3 Line # 35 Code: C
Comment: The text should summarize how the trigger levels for the COCs were derived. Specifically, a summary of the calculations discussed in Appendix B of the document entitled "RTRAK Applicability Study" is needed.
- 9) Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
Section #: 4.0 Pg. #: 4-2 Line # 22 Code: C
Comment: The certification design rationale described in Appendix G of the SEP does not indicate how nondetects will be treated. The text should discuss the method that will be used for treatment of nondetects (e.g., substitution of 1/2 the detection limit, etc.) in the statistical analyses for certification.
- 10) Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
Section #: Table 3 Pg. #: 5 Line # Code: C
Comment: This table's formatting should be corrected so that spurious characters do not appear in the results column. If the non-numeric characters in the column are intentional, an explanation of all qualifiers appearing in the table should be provided.

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- 11) Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
Section #: Figs. 3 thru 6 and 8 thru 10 Pg. #: Line # Code: C
Comment: The legend should include an explanation of what the unshaded (white) areas on
these figures represent (e.g., south of the Trap Range). It appears that these areas were not
characterized using real time methods or by physical sampling.