



State of Ohio Environmental Protection Agency

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L-01063

MAR 23 1998

George V. Voinovich  
Governor

March 17, 1998

RE: DOE FEMP  
COMMENTS: RESPONSE TO  
COMMENTS ON THE SITEWIDE  
EXCAVATION 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 as an attachment Ohio EPA's comments on DOE's February 3, 1998 submittal "Submittal of Draft Responses to Comments from the USEPA and Ohio EPA on the draft Sitewide Excavation Plan". Ohio EPA recommends incorporation of revised responses into a final response package submitted with the revised SEP.

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 EPA COMMENTS ON THE SITE-WIDE EXCAVATION PLAN

**Response to Comments**

- 1) Commenting Organization: OEPA                      Commenter: OFFO  
 Section #:    Pg #: Line #:                      Code: C  
 Original Comment #: 1  
 Comment: The response should be revised to include: samples should be collected from the footprint and sidewalls of the excavation; a minimum of 8 samples should be collected within each unit; each HWMU should be a specific CU if multiple HWMUs within a building foundation it may be one CU.
- 2) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #:    Pg #: Line #:                      Code: C  
 Original Comment #: 5  
 Comment: Ohio EPA disagrees with DOE's suggested basis for conducting VOC screening. In addition to protecting the liner, it was also aimed at preventing characteristic hazardous waste from being placed in the OSDF. Ohio EPA believes DOE committed to treating soils with detectable concentrations of VOCs as determined by field screening. This appears to be significantly different than DOE's proposal to only treat "solvent-saturated soils."
- 3) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #:    Pg #: Line #:                      Code: C  
 Original Comment #: 17  
 Comment: As discussed during the March 10 & 11 meeting, Ohio EPA does not believe the existing frozen data sets are appropriate for ASCOCs or WAC COC screening. An additional database should be developed that will be utilized for COC & WAC screening. DOE should propose a list of parameters for selecting the data and the EPAs should review the screens as a part of the SEP approval. This database would then be used for all WAC and COC screening.
- 4) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #:    Pg #: Line #:                      Code: C  
 Original Comment #: 18  
 Comment: Ohio EPA does not understand the last two changes proposed in the action section of this response. Ohio EPA does not believe the data base being used presently is appropriate for screening of WAC or FRL COCs. As discussed at our March 10 & 11 meetings, an additional database should be developed that will be utilized for COC & WAC screening. DOE should propose a list of parameters for selecting the data and the EPAs should review the screens as a part of the SEP approval. This database would then be used for all WAC and COC screening.
- 5) Commenting Organization: Ohio EPA                      Commentor: HSI GeoTrans  
 Section #:    Pg #: Line #:                      Code: C

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**Original Comment #: 51**

Comment: From the DOE response, it is unclear what area of the text will be revised. The section indicated in the response that will be changed is the section that discusses the procedures that will be implemented in the event of non-attainment of a given CU (section 3.4.5). The text referenced in the original comment (pg 4-12), however, is the text that should be revised to include reference to section 3.4.5 for non-attainment procedures. This response also applies to DOE Responses to original comments 52, 57, 59, 60, and 63.

- 6) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #:    Pg #: Line #:                      Code: C  
 Original Comment #: 55  
 Comment: Revise the comment to state that a limited number of the samples from the west pile will be analyzed for Tc-99.
- 7) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #:    Pg #: Line #:                      Code: C  
 Original Comment #: 66  
 Comment: As discussed during the March 10 & 11 meeting, Ohio EPA understands DOE will revise the response and provided the requested documentation for information to Ohio EPA.
- 8) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #:    Pg #: Line #:                      Code: C  
 Original Comment #: 67  
 Comment: Ohio EPA disagrees with DOE's conclusion regarding the designation of unpaved roads. Ohio was clearly understood the BAT agreement to be that DOE and Ohio EPA would field locate the beginning of all unpaved roads. The designation of unpaved roads was the subject of much discussion during negotiation of the BAT policy.

**Additional Comments on Appendix G**

- 9) Commenting Organization: OEPA                      Commentor: HSI GeoTrans  
 Section #: Appendix G                      Pg. #: G-6 and Fig. G-1                      Line #: 21                      Code: M  
 Original Comment #  
 Comment: US EPA (1992) suggests that if the percentage of nondetects exceeds 15 percent, the results of parametric statistical tests (such as the t-Test) are unreliable. The text suggests that the t-Test will be used in cases with nondetects up to 50 percent. Justification should be provided for the use of the t-Test for testing samples with such high nondetect percentages.
- 10) Commenting Organization: OEPA                      Commentor: HSI GeoTrans

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Section #: Appendix G Pg. #: G-6 and Fig. G-1 Line #: 21 Code: C

Original Comment #

Comment: The text should indicate a specific minimum number of nondetects that can be tolerated for use of the t-Test. In addition, the text should indicate how nondetects will be treated in the t-Test analysis. For example, will each nondetect be substituted by its respective DL/2 for the purposes of calculation?

- 11) Commenting Organization: OEPA Commentor: HSI GeoTrans  
 Section #: Appendix G Pg. #: G-7 Line #: 12 Code: C  
 Original Comment #  
 Comment: The Type I error rate for the test is not specified. Based on other discussions in this section, it is assumed that the alpha value is 0.05. Please confirm the Type I error rate that will be used.
- 12) Commenting Organization: OEPA Commentor: HSI GeoTrans  
 Section #: Appendix G Pg. #: G-8 Line #: 3 Code: C  
 Original Comment #  
 Comment: The text should indicate what confidence level will be used for the upper confidence level (UCL) on the mean and that a one-sided confidence interval is being used. Presumably the confidence level is 95%, but this is not explicitly stated. In addition, the text should be clarified to indicate how the comparison between the UCL on the mean and the FRL will be interpreted. For example, if the one-sided upper 95% confidence level on the mean is less than the FRL, the CU will pass certification.

### Reference

US EPA 1992. Statistical analysis of ground-water monitoring data at RCRA facilities: Addendum to interim final guidance. Washington, D.C.: Office of Solid Waste, U.S. Environmental Protection Agency. Draft. EPA