



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street  
Dayton, Ohio 45402-2911  
(513) 285-6357  
FAX (513) 285-6249

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George V. Voinovich  
Governor

November 24, 1998

RE: DOE FEMP  
COMMENTS: CERTIFICATION REPORT  
FOR AREA 1, PHASE I - SEDIMENT  
TRAPS 2 & 3

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

Dear Mr. Reising:

Ohio EPA has reviewed DOE's November 1998 version of the "Certification Report for Area 1 Phase I - Sediment Traps 2 & 3". Ohio EPA's comments on the document are detailed below.

1. Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: Appendix A              Pg. #:              Line #:              Code: C  
 Comment: The data have an unacceptably high percentage of data with a "J" qualifier. For some CUs all data for a given parameter are "J" qualified. This is particularly concerning for contaminants such as Ra-226, where the "J" value is very near the FRL and small error may result in an incorrect decision regarding the CU certification status. DOE should consider reanalysis of the data to reduce the number of "J" qualified data. An additional effort could include a discussion of the bias represented by the "J" qualifier. Specifically if the "J" results from negative uncertainty (i.e., the value is likely to be lower) then the concern over CU failure is substantially less. The certification report should be revised to incorporate a discussion of the "J" qualifiers and their potential impact on certification status.

If you have any questions, please contact me.

Sincerely,

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

cc: Jim Saric, U.S. EPA                      Ruth Vandergrift, ODH                      Francie Barker, Tetra Tech  
Terry Hagen, FDF                      Mark Shupe, HSI GeoTrans

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