

**RESPONSES TO OHIO EPA COMMENTS ON THE PROJECT SPECIFIC PLANS
FOR AREA 9, PHASE I PRECERTIFICATION PHYSICAL SAMPLING
AND REAL-TIME SCANNING**

1896

PSP FOR AREA 9, PHASE I PRECERTIFICATION PHYSICAL SAMPLING

Commenting Organization: Ohio EPA
Section #: General/Section 1.1 Pg #: 1-1 Line #: Commentor: OFFO
Original Comment #: 1 Code: C
Comment: Ohio EPA thinks that real-time and sample collection should be conducted after crops are harvested. Due to sampling with a Geoprobe® will create substantial disturbance to crops as the real-time equipment.

Response: Agree.

Action: Sampling will not be conducted until after crops are harvested.

Commenting Organization: Ohio EPA
Section #: 1.1 Pg #: 1-1 Line #: 22 Commentor: OFFO
Original Comment #: 2 Code: C
Comment: Line 22 states that sampling will only create a *minimal* disruption to crops. However Section 2.1 page 2-1 states that the sample collection will be done using a Geoprobe®. Ohio EPA would consider this as being more than a *minimal* disturbance.

Response: Agree.

Action: This sentence will be removed from the text for the next revision of the PSP, which will be issued after discussions with the land owner. This revision will also include any changes that result from these discussions.

Commenting Organization: Ohio EPA
Section #: 2.4 Pg #: 2-3 Line #: 7 Commentor: OFFO
Original Comment #: 3 Code: C
Comment: Section 2.0, lines 5-6 state that seven boring locations have been selected, which correlates with Figure 2-1. The above referenced section lists only 6 boring numbers. Please correct.

Response: Agree.

Action: The "6" will be changed to a "7" in Section 2.4, where boring numbering is discussed. Again, the PSP will be revised and reissued after discussions with the landowner, and this change will be included.

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DOE RESPONSE TO OEPA ORIGINAL COMMENT # 10

Commenting Organization: Ohio EPA
 Section #: DQO Section 7.3 Pg #: 6 Line #: Commentor: OFFO
 Original Comment #: 4 Code: C

Comment: In DOE's response to OEPA's comment, a typo appears stating that the total uranium detection limit is 103 mg/kg for WAC. This should be 1030 mg/kg.

Response: The WAC for total uranium is 1030 mg/kg. According to SCEP criteria, the detection limit is set at 10 percent of the action level of interest. Therefore, the detection limit for total uranium WAC attainment is 103 mg/kg. Of note, this is more conservative than using detection level of 1030 mg/kg.

Action: None.

PSP FOR AREA 9, PHASE I PRECERTIFICATION REAL-TIME SCANNING

Commenting Organization: Ohio EPA
 Section #: 2.4 Pg #: 2-4 Line #: 26 Commentor: OFFO
 Original Comment #: 5 Code: C

Comment: As stated in the Users Manual for Real-Time Measurements, the surface moisture gauge measurements should be conducted based on the *actual* environmental conditions not having changed, not on whether the environmental conditions are *expected* to change.

Response: Agree.

Action: The PSP will be revised and reissued after discussions with the landowner, and this change will be included.

Commenting Organization: Ohio EPA
 Section #: 2.4 Pg #: 2-4 Line #: 29 Commentor: OFFO
 Original Comment #: 6 Code: C

Comment: More than 'a soil core' needs to be taken if conditions are unsuitable for moisture measurements. This section needs to specify that soil cores will be taken where the moisture measurements would have been. Also, no depth for the soil core is specified. The Users Manual for Real-Time Measurements states that these cores will be 4 inches in depth. Please correct.

Response: Agree that the referenced text needs to be clarified.

Action: Replace the referenced text with the following: "If surface soil conditions are unsuitable for moisture measurements, a soil core will be collected at each location where the moisture measurement would have been taken. This core will be collected according to the Real-Time User's Manual." The PSP will be revised and reissued after discussions with the landowner, and this change will be included.

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