



State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

April 13, 1999

RE: DOE FEMP  
COMMENTS: PSP FOR  
SAMPLING OF REMOVAL  
ACTION 17 STOCKPILES 1, 2  
AND 4 FOR OSDF WAC  
ATTAINMENT

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 March 8, 1999 submittal, "Project Specific Plan for Sampling of Removal Action 17 Stockpiles 1, 2 and 4 for OSDF WAC Attainment". Attached are Ohio EPA's comments on the document.

If you have any questions, please contact Michelle Waller 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 Hodge, Tetra Tech EM Inc.  
Manager, TPSS/DERR,CO

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**OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE  
PSP FOR WAC ATTAINMENT SAMPLING OF  
STOCKPILES 1, 2 AND 4**

Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 2.1    Pg #:              Line #:                      Code: general  
Comment: This Plan specifies that ten samples will be taken from each of the stockpiles. Considering the high degree of heterogeneity and the lack of process knowledge of the excavated areas, this number is low.  
Consider the West Stockpile. The expected heterogeneity is low based on the assumed contamination mechanism of airborne deposition. Sixty random samples and 28 biased samples were deemed necessary to adequately demonstrate WAC attainment.  
Consider the East Stockpile. Same expectations of homogeneity, same deposition mechanism but 24 samples were used to demonstrate WAC attainment.  
Consider SP-5. This stockpile is more similar to the three piles being considered in this Plan. The pile is expected to be highly heterogeneous because soils from a variety of locations were composited into one pile.

Commenting Organization: OEPA    Commentor: OFFO  
Section #: 1.2.1.1              Pg #: 1-2              Line #: 6-9                      Code: C  
Original Comment #:  
Comment: The text states that SP-1 is divided into two distinct areas, but does not explain how. It is also stated that the western portion of this pile will remain open to accept soil, but does not provide a plan as to how the pile will be managed to prevent compromising the sampled eastern portion. Please provide clarification.

Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 1.2.1.2.1              Pg #: 1-2              Line #: 34                      Code: C  
Comment: In general, Ohio EPA would prefer a more specific description of existing data. Statements such as "All TCLP results were either non-detects or were below the TCLP regulatory limit..." are not precise enough because the reader will inevitably ask the question "How far are the results below the regulatory limit and what are the chances that there are soils above the regulatory limit present". In the present case, however, the Plan as written is precise enough because data is available from only the Maintenance Building Warehouse construction.