



Department of Energy

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2247

MAY 25 1999

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

DOE-0771-99

Dear Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE DRAFT PROJECT SPECIFIC PLAN FOR AREA 1, PHASE II
EXCAVATION MONITORING AND PRECERTIFICATION**

Enclosed please find responses to the Ohio Environmental Protection Agency's (OEPA) comments on the draft Project Specific Plan (PSP) for Area 1, Phase II (A1PII) Excavation Monitoring and Precertification.

If you have any questions or comments regarding these documents, please contact Robert Janke at (513) 648-3124.

Sincerely,

Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

Enclosure

Mr. Tom Schneider

-2-

MAY 25 1999

cc w/enclosure:

J. Saric, USEPA-V, SRF-5J

T. Schneider, OEPA-Dayton (three copies of enclosure)

F. Barker, Tetra Tech

AR Coordinator, FDF/78

cc w/o enclosure:

R.J. Janke, OH/FEMP

K. Nickel, OH/FEMP

D. Carr, FDF/52-0

J. Chiou, FDF/52-0

T. Crawford, FDF/52-0

A. Duarte, FDF/52-0

T. Hagen, FDF/65-2

ECDC, FDF/52-7

**RESPONSES TO THE OHIO EPA COMMENTS ON THE
PROJECT SPECIFIC PLAN FOR AREA 1, PHASE II
EXCAVATION MONITORING AND PRECERTIFICATION
(20710-PSP-0007, REVISION A)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

Commenting Organization: Ohio EPA
Section #: 2.2 Pg #: 2-2 Line #: 18-22 Commentor: OFFO
Original Comment #: 1 Code: C

Comment: The four physical samples planned for collection from the sludge drying beds are not a sufficient number of samples for the area. According to Figure 2-1, there is a gap in the center of the sludge drying beds that warrants more sampling to detect that all above-WAC material has been removed. Ohio EPA believes that two additional samples must be collected to confirm that the above-WAC Tc-99 contaminated material did not further contaminate the bed area. Also, since the removal of the above-WAC berm material is being determined only by visual observation, the berm must be sampled to ensure all above-WAC material has been removed.

Response: Two additional samples will be collected from the sludge drying beds area once all of the above-WAC material has been removed. In addition, three samples will be collected from the berm area. These samples will be collected once the north, south, and west berms are removed. The correct figure which shows proposed sample locations is 2-2.

Action: This text and figure will be revised.

Commenting Organization: Ohio EPA
Section #: 3.1 Pg #: 3-1 Line #: 12-13 Commentor: OFFO
Original Comment #: 2 Code: C

Comment: This section states that "The exact limits of the berm material classified as above-WAC will be determined based on field observations." What type of field observation will be used to make this decision? Please clarify.

Response: The exact limits of the berm which will be classified as above-WAC will be determined by observation of visual residue or discoloration. If differentiation between the above-WAC sludge cake and associated materials is not readily discernable, the materials will be assumed to be contaminated and removed and containerized. The east and north walls of the berm is constructed of clean soil and will not be containerized unless visual observation reveals visible residue or discoloration of the soil from the above-WAC material.

Action: The text will be revised to include this clarification.

Commenting Organization: Ohio EPA
Section #: 3.2.1 Pg #: 3-1 Line #: 25 Commentor: OFFO
Original Comment #: 3 Code: C

Comment: This line states that only two lifts are expected. An additional statement explaining that as many lifts as possible will be scanned needs to be added. Please correct:

Response: The text will be modified to indicate that although two lifts are expected, additional lifts will be performed as determined from real time monitoring data as long as safety is not an issue.

Action: The text will be modified.

Commenting Organization: Ohio EPA
Section #: 3.3.9 Pg #: 3-8 Line #: 18-19 Commentor: OFFO
Original Comment #: 4 Code: C

Comment: Again, this line references only two lifts. The reference either needs to be removed, or the possibility of more lifts added. Please correct.

Response: Agree.

Action: The reference will be removed.

Commenting Organization: Ohio EPA
Section #: Appendix A Pg #: Line #: Commentor: OFFO
Original Comment #: 5 Code: C

Comment: Appendix A, the Data Quality Objectives, is missing. Please supply.

Response: Failure to include the Data Quality Objectives (DQO) was an oversight.

Action: This DQO, as well as other applicable DQOs will be provided in the revised Project Specific Plan.