



State of Ohio Environmental Protection Agency

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June 7, 1999

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

RE: COMMENTS ON PSP FOR A2PI

Dear Mr. Reising:

Ohio EPA has reviewed DOE's May 5, 1999 submittal "Project Specific Plan for Area 2, Phase I South Field Excavation Characterization". Please revise this document to reflect the changes in the attached comments.

If you have any questions, please contact Michelle Waller or me.

Sincerely,

for
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 EPA Comments on
PSP for AREA 2, PHASE I

2277

1. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: E
Original Comment #:
Comment: As mentioned numerous times before, please include line numbering to assist in the review and commenting on all documents.

2. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.0 Pg. #: 1-1 Line #: first paragraph Code: C
Original Comment #:
Comment: This paragraph references Section 6.0 for documents on excavation characterization and data collection, while the actual Section 6.0 is Data Management. Section 7.0 is Applicable Documents, Methods and Standards. Please correct.

3. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.2 Pg. #: 1-21 Line #: first paragraph Code: C
Original Comment #:
Comment: The last sentence references Section 6.0 when the correct section is 7.0. Please correct.

4. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.2 Pg. #: 1-3 Line #: second paragraph Code: C
Original Comment #:
Comment: This paragraph references Section 6.0 for training procedures, while 6.0 discusses Data Management. Please clarify.

5. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.2 Pg. #: 2-2 Line #: first paragraph Code: C
Original Comment #:
Comment: This section, and all sections in this document which reference the use of the Gator must be removed. Ohio EPA has not seen any information regarding the use, reliability and comparability of data gathered with the Gator and will not approve the use of it without further information. Please correct.

6. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.3.4 Pg. #: 2-5 Line #: first paragraph Code: C
Original Comment #:
Comment: This section references a process shown in Figure 2-2, while Figure 2-2 is a map of the Southern Waste Unit. Please correct.

7. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.6 Pg. #: 2-10 Line #: first sentence Code: C
Original Comment #:
Comment: This section references Figure 2-3 for Area D lead-contaminated soil, while Figure 2-3 is an Excavation Monitoring form. Please clarify.
8. Commenting Organization: OEPA Commentor: OFFO
Section #: Appendix A Pg. #: 4 of 13 Line #: last paragraph Code: C
Original Comment #:
Comment: See comment 5.