



State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

August 9, 1999

2442

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

**RE: COMMENTS ON THE PSP FOR THE PREDESIGN SAMPLING IN THE A2PI  
NWU AND A2PII - PART ONE**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's July 6, 1999 submittal on the "Project Specific Plan for Predesign Sampling in the Area 2, Phase I Non-Waste Units and Area 2, Phase II - Part One". Attached are Ohio EPA's comments on the document.

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  
Terry Hagen, FDF  
Ruth Vandergrift, ODH  
Mark Shupe, HSI GeoTrans  
Francie Hodge, Tetra Tech EM Inc.  
Manager, TPSS/DERR,CO

**Ohio EPA Comments on the PSP for Predesign  
Sampling in the A2P1 Non-Waste Units and A2P1I - Part One**

1.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: General Comment    Pg. #:                      Line #:                      Code: C  
Original Comment #:

Comment: Based upon a field inspection Ohio EPA conducted of the proposed sampling area, we believe additional field reviews of the area by the PSP writers are necessary. The document should point out areas of known disposal and waste material types. These areas are especially evident between the SWU's and Paddys Run/SSOD.

2.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: General Comment    Pg. #:                      Line #:                      Code: C  
Original Comment #:

Comment: In order to locate areas of past disposal outside the boundaries of the SWU, DOE should consider the use of magnetometer or ground penetrating radar. An additional technique that could be considered would be exploratory trenches.

3.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: General Comment    Pg. #:                      Line #:                      Code: C  
Original Comment #:

Comment: Given the fact that disposal activities have obviously occurred in the area south of the SWU, the PSP writers should interview individuals who have conducted operations in the area, including SWU Site Prep and installation of the box culvert over the SSOD, for additional information on disposal activities. A review of historical aerial photographs may provide additional information.

4.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 1.1    Pg. #: 1-1    Line #:                      Code: C  
Original Comment #:

Comment: The section states the purpose of the PSP is to determine if additional excavation is necessary. Ohio EPA believes it is obvious that substantial excavation will be necessary between the SWU and Paddys Run/SSOD. Therefore, we believe the PSP should be aimed at refining excavation strategy. A re-evaluation of the PSP strategy and associated sampling is necessary with these considerations in mind.

5.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 1.2    Pg. #: 1-3                      Line #: 1-6    Code: C  
Original Comment #:

Comment: Due to A2P1's history and the uncertainties built into the past thorium results, it would seem to be in DOE's best interest to further investigate the thorium contamination of the locations in question. Can these sources of uncertainty be affirmed by DOE?

6.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 1.3    Pg. #: 1-4                      Line #: 2                      Code: C

Original Comment #:

Comment: Ohio EPA feels that it would be beneficial to perform real-time scanning on all accessible areas within the scope of this PSP, not just portions of the perimeter. Please correct.

7.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.2.1    Pg. #: 2-3                      Line #: 6-9                      Code: C

Original Comment #:

Comment: Why are the locations A2P1-NWU through A2P1-NWU-15 being excluded from submitting the first 12-inch interval if no other interval shows beta-gamma activity? Please clarify.

8.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.2.1    Pg. #: 2-3                      Line #: 10-11                      Code: C

Original Comment #:

Comment: All intervals not being analyzed should be archived for possible future analysis. Please correct.

9.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.2.1    Pg. #: 2-3                      Line #: 16-21                      Code: C

Original Comment #:

Comment: This paragraph explains that a description of the material collected will be noted. However, there is no mention of how the gross fragments will be handled when they are separated from the soil during the sampling event. Please clarify.

10.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.3    Pg. #: 2-4                      Line #: 13                      Code: C

Original Comment #:

Comment: Again, Ohio EPA feels that it would be beneficial to perform real-time scanning on all accessible areas within the scope of this PSP. Please correct.

11.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 3.0    Pg. #: 3-1                      Line #: 3 - 14                      Code: C

Original Comment #:

Comment: Due to the unknown disposal history in the areas proposed for sampling, Ohio EPA believes it is appropriate for all samples to be analyzed for total uranium, thorium-228 &-232 and radium-226. Ohio EPA does not believe the primary radionuclide contaminant list should be reduced, especially in areas of unknown disposal activity.

12.) Commenting Organization: OEPA                      Commentor: OFFO

Section #: General   Pg. #:                      Line #:                      Code: C

Original Comment #:

Comment:

Comment: a) Table 3-1 is not clear on what method will be used for a specific analyte. Please clarify this in the table.

b) Please provide a column indicating the detection limits that will be used for each analyte and the associated method.

13.) Commenting Organization: OEPA                      Commentor: OFFO

Section #: 4.0                      Pg. #: 4-1                      Line #: 7                      Code: C

Original Comment #:

Comment: This line states that sample material will be managed per PWID #467. Reference to the PWID does not provide sufficient detail for evaluation of the appropriateness of material disposition. Please provide more information.

14.) Commenting Organization: OEPA                      Commentor: OFFO

Section #: 4.0                      Pg. #: 4-1                      Line #: 8-9                      Code: C

Original Comment #:

Comment: Ohio EPA would expect decontamination waters to be discharged to a waste water system rather than a storm water basin under normal circumstances. Is discharge of decon water to the storm water system standard procedure or was this developed for this PSP?

15.) Commenting Organization: OEPA                      Commentor: OFFO

Section #: 4.0                      Pg. #: 4-1                      Line #: 16                      Code: C

Original Comment #:

Comment: Please include in this PSP the location for the disposition of archive soil samples.