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OCT 1 1999

Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-1149-99

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

Dear Mr. Saric and Mr. Schneider:

TRANSMITTAL OF RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE PROJECT SPECIFIC PLAN FOR THE CERTIFICATION OF AREA 1, PHASE II UTILITY TRENCHES

Enclosed for your review are responses to the Ohio Environmental Protection Agency (OEPA) comments on the Project Specific Plan (PSP) for the Certification of Area 1, Phase II (A1PII) Utility Trenches that was sent to you on September 10, 1999.

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

Sincerely,

Johnny Reising

Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

Enclosure

cc w/enclosure:
T. Schneider, OEPA-Dayton (three copies of enclosure)
F. Barker, Tetra Tech
AR Coordinator, FDF/78

cc w/o enclosure:
D. Carr, FDF/52-2
J. D. 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 OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE PROJECT SPECIFIC PLAN FOR THE CERTIFICATION OF AREA 1, PHASE II UTILITY TRENCHES (REVISION 0)

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FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

Commenting Organization: OEPA — Commentor: OFFO
Section #: 2.2 — Page #: 2 — Line #: 25-26 — Code: E
Original Comment #: 1

Comment: This sentence appears to be incorrect. Line 25 is referencing this PSP. Should it be referring to the CDL that accompanies this PSP? Please clarify.

Response: Agreed. The correct reference is to the Certification Design Letter (CDL).

Action: The text will be revised accordingly.

Commenting Organization: OEPA — Commentor: OFFO
Section #: 2.2 — Page #: 2 — Line #: 31-32 — Code: C
Original Comment #: 2

Comment: The sampling plan presented here does not follow the plan as agreed upon in Section 4 of the A1PII Supplemental Characterization Package. Instead of the certification sample being taken from a stockpile, FDF is to 'sample the last bucket removed from the trench bottom for FRLs'. Please correct.

Response: The certification sample is from the last bucket excavated from the utility trench. The trackhoe operator is dumping the excavated soil on the ground, making a stockpile approximately 6 feet in diameter and approximately 6 inches deep, rather than pausing to allow for sampling from the bucket. The HPGe measurement and certification sample are then taken from the stockpile. To date, 16 certification samples have been collected in this manner, however, all remaining samples will be taken from the bucket.

Action: A variance has been written to instruct that all remaining samples be collected from the bucket. The variance will be forwarded to the Agencies.

Commenting Organization: OEPA — Commentor: OFFO
Section #: 2.4 — Page #: 4 — Line #: 10-12 — Code: C
Original Comment #: 3

Comment: If above FRL contamination is found in the soils and they are removed, the area should be rescanned to ensure that all above FRL soils have been removed.

Response: Agreed.

Action: If above-FRL conditions are found the area will be rescanned.

Commenting Organization: OEPA Commentor: OFFO
Section #: 2.5 Page #: 4 Line #: 15-20 Code: C
Original Comment #: 4
Comment: In past PSP submittals, the sampling methods are spelled out. However, this PSP states that other methods will be used "at the discretion of the Sampling Field Manager." Please be specific.

This section also states that cores are being used to collect the soil samples. Please clarify.

Response: As discussed in the text, all sampling will comply to the procedures in SMPL-01, *Solids Sampling*. Sample collection will occur driving a 2 or 3-inch diameter plastic or stainless steel liner into the bucket of the trackhoe, which will then be sealed using plastic end caps to create a sample container. The sample container will be approximately 6 inches long. As discussed in the response to Comment 2, sampling for 16 samples was done by driving the liner into the stockpile to a depth of approximately 3 inches. The term "core" in the context of this sampling event is used in reference to the plastic or stainless steel liner.

Since this certification sampling is unique in that the samples are not being collected *in situ*, the Sampling Field Manager is being given latitude to collect samples in a manner that ensures personnel safety and sample integrity. If the sample methodology deviates from the process as described above, the Agencies will be notified prior to its implementation.

Action: None.

Commenting Organization: OEPA Commentor: OFFO
Section #: 2.5 Page #: 4 Line #: 18-19 Code: E
Original Comment #: 5
Comment: See Comment 2.

Response: See response to Comment 2.

Action: None.

Commenting Organization: OEPA Commentor: OFFO
Section #: 2.5 Page #: 4 Line #: 24 Code: E
Original Comment #: 6
Comment: This sentence was left unfinished. Please correct.

Response: The sentence should read as follows: To meet the quality control requirements, twice the sample volume will be collected at the following locations: A1PII-S3UT-01-01, A1PII-S3UT-02-12, A1PII-S3UT-03-07, A1PII-S3UT-04-16, and A1PII-S3UT-05-03.

Action: The text will be revised accordingly.

Commenting Organization: OEPA Commentor: OFFO
Section #: Table 2-3 Page #: 5 Line #: Code: C
Original Comment #: 7

Comment: Please include in Table 2-3 whether the on or off-site lab will be used for analyzing the samples, and the sample volume requirements.

Response: The on-site laboratory will perform these analyses. The required sample volume is 250 mL for the radiological analysis and 250 mL for the metals analysis.

Action: The text will be revised accordingly.