



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

November 4, 1999

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

**RE: COMMENTS - WASTE ACCEPTANCE CRITERIA ATTAINMENT REPORT
FOR REMOVAL ACTION 17 STOCKPILES 1, 2, AND 4**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's October 22, 1999 submittal on the "Waste Acceptance Criteria Attainment Report for Removal Action 17 Stockpiles 1, 2, and 4". Attached are Ohio EPA's comments on the document.

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

Sincerely,

Michelle Waller
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.

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Ohio Environmental Protection Agency Comments on the
WAC Attainment for RA 17 Stockpile 1, 2 and 4

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1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.0 Pg. #: 1-1 Line #: 10-12 Code: C
Comment: This paragraph states that an addendum to this report, *WAC Attainment Report for Removal Action 17 Stockpiles 1,2, and 4*, will be issued to present results on the western portion of SP-1. This is unacceptable to Ohio EPA. A separate submittal on SP-1's western portion should be issued with the results and WAC attainment determination.

2. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: PSP Revision 0 Pg. #: Line #: Code: C
Comment: Ohio EPA has noticed that this final revision of the PSP has many sentences and sections which were either added or changed *after* Ohio EPA approved the document. Ohio EPA approved the Revision B (March 1999) with the inclusion of the resolutions to comments. An example of one of these changes includes Section 3.0, first paragraph. The possible use the GATOR was added. The use of the GATOR is not acceptable to the Ohio EPA, and this has been stated many times. Another example would be Section 3.1, second paragraph. The approved PSP states that physical samples will be collected if the RTRAK/RSS scan exceeds the trigger level, while the Revision 0 changes that and states that an HPGe shot will be done instead. Numerous other changes can be found throughout the document. Ohio EPA would like an explanation and justification as to why this document was changed after final approval without notifying the agencies.