



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

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November 22, 1999

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

RE: COMMENTS - CDL FOR A1PII CERTIFIED FOR REUSE AREAS, TRAP RANGE, SECTOR 2C, AND SECTOR 3 CERTIFICATION SAMPLING

Dear Mr. Reising:

Ohio EPA has reviewed DOE's November 1, 1999 submittal on the "Certification Design Letter for Area 1, Phase II Certified for Reuse Areas, Trap Range, Sector 2C, and Sector 3 Certification Sampling". Ohio EPA approves the sampling of all Certification Units, with the exception of A1P2-S3HR-04, A1P2-S3SA-02 and A1P2-S2SA-09. Attached are Ohio EPA's comments on the document.

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

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**Ohio EPA Comments on the CDL for A1P11 Certified for
Reuse Areas, Trap Range, Sector 2C and Sector 3 Certification Sampling**

1.) Commenting Organization: OEPA Commentor: OFFO
Section #: 2.2 Pg. #: 2-3 Line #: 40-41 Code: C
Original Comment #:

Comment: OEPA does not see any area in Figure A-1 which would appear elevated. According to this map, almost the whole area is elevated with reading of 2500 to 3500 cps, with only the northwest area having lower cps. Please clarify.

2.) Commenting Organization: OEPA Commentor: OFFO
Section #: 4.1.2 Pg. #: 4-4 Line #: 18 Code: C
Original Comment #:

Comment: This line refers to an 'OSB' basin. Please define what 'OSB' stands for.

3.) Commenting Organization: OEPA Commentor: OFFO
Section #: 4.2 Pg. #: 4-9 Line #: 25-33 Code: C
Original Comment #:

Comment: A.) How will the top 6 inches of native soil be determined?

B.) OEPA does not feel that one sample from each CU that was part of Removal Action 14 is enough. More samples need to be added to ensure all contamination was removed during RA 14. Also, please include a map showing the locations of RA 14 overlaid on the current CUs and sampling locations.

C.) Has any characterization been done on the fill which was 'from an unknown source'?

D.) This section needs to state that if contamination is found at depth, the soil will be dug up and resampled.

4.) Commenting Organization: OEPA Commentor: OFFO
Section #: Figure 4-2 Pg. #: Line #: Code: C
Original Comment #:

Comment: The CU east of S2-NI-03 and S2-NI-04 is not labeled. Please correct.