



Department of Energy

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Ohio Field Office
Fernald Area Office

P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155

JAN 26 2000

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-0357-00

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 DRAFT CERTIFICATION DESIGN LETTER AND DRAFT PROJECT
SPECIFIC PLAN FOR AREA 1, PHASE II CERTIFIED FOR REUSE AREAS, TRAP RANGE,
SECTOR 2C, AND SECTOR 3 CERTIFICATION SAMPLING**

Reference: Letter, T. Schneider to J. Reising, "Comments – CDL for AIIII Certified
for Reuse Areas, Trap Range, Sector 2C, and Sector 3 Certification
Sampling," dated November 22, 1999

Enclosed for your review and approval are responses to the Ohio Environmental Protection
Agency (OEPA) comments on the draft Certification Design Letter (CDL) and draft Project
Specific Plan (PSP) for Area 1, Phase II Certified for Reuse Areas, Trap Range, Sector 2C,
and Sector 3 Certified Sampling. Upon approval, these documents will be revised
accordingly.

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Mr. James A. Saric
Mr. Thomas Schneider

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JAN 26 2000

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

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

Enclosures

cc w/enclosures:

G. Jablonowski, USEPA-V, SRF-5J
T. Schneider, OEPA-Dayton (three copies of enclosures)
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
F. Barker, Tetra-Tech
AR Coordinator, FDF/78

cc w/o enclosures:

N. Hallein, EM-42/CLOV
A. Tanner, OH/FEMP
D. Carr, FDF/52-2
T. Hagen, FDF/65-2
J. Harmon, FDF/90
R. Heck, FDF/2
S. Hinnefeld, FDF/31
T. Walsh, FDF/65-2
ECDC, FDF/52-7

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**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE PROJECT SPECIFIC PLAN FOR AREA 1, PHASE II CERTIFIED FOR REUSE
AREAS, TRAP RANGE, SECTOR 2C AND SECTOR 3 CERTIFICATION SAMPLING
(20710-PSP-0009, REVISION A)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

Commenting Organization: Ohio EPA

Commentator: OFFO

Section #: 2.1

Pg. #: 2-3

Line #: 2-6

Code: C

Original Comment #: 1

- 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.

Response: See Response to OEPA Original Comment 3 on the Certification Design Letter.

Action: The appropriate changes will be made to the PSP including the following:

- Figures 2-1 (A1PII Certification Units Design) and 2-3 (A1PII Sectors 2 and 3 CU Boundaries and Sample Locations) will be updated
- Appendix B will be updated to include the additional CU and the revised sample point information for CUs A1PII-S3SA-04, A1PII-S3SA-08, A1PII-S3SA-09, and A1PII-S3SA-11
- Section 2.1, Page 2-2, Lines 44-47 and Page 2-3, Lines 1-7: This bullet will be replaced with the following:

“CUs A1P2-S3SA-09 and A1P2-S3SA-11 -During Removal Action 14, spot excavations were performed in locations within these CUs which removed between 6 and 18 inches of soil. The “Removal Action 14 Contaminated Soils Adjacent to the Sewage Treatment Plant Incinerator Final Report” notes that the off-property excavations were backfilled, however, the on-property excavation areas were not backfilled. Additionally, another 6 inches of soil was removed from these areas during STP remediation activities. Precertification realtime scanning, as well as additional analyses of physical samples, show no areas that exceed the FRL. Samples will be collected and analyzed at two intervals (0 to 6-inch and 6 to 12-inch) in all sixteen locations for these CUs.”

- Prior to reconfiguration of the CUs, the CG&E tower straddled the line between CUs A1P2-S3SA-08 and A1P2-S3SA-09. The CG&E tower now falls entirely in CU A1P2-S3SA-08. Two sample point locations were identified under the tower which would be collected in addition to the certification samples. These sample points will not change, however, the sample identifiers will be changed to reflect their origin in CU A1P2-S3SA-08. Appendix B will be updated and the following update will be made to the bullet in Section 2.1, Page 2-2, Lines 20-22:

“CUs A1P2-S3SA-08 – A CG&E tower is located in this CU in the 6-inch stripping area. The area under the tower was not accessible for stripping.”

Commenting Organization: Ohio EPA
 Section #: Figure 2-3 Pg. #: Line #: Commentator: OFFO
 Original Comment #: 2 Code: C
 Comment: The CU east of S2-NI-03 and S2-NI-04 is not labeled. Please correct.

Response: The figure will be clarified to properly identify S2-NI-05.

Action: A revised figure will be provided.

Commenting Organization: Ohio EPA
 Section #: 2.3.2 Pg. #: 2-6 Line #: 28-32 Commentator: OFFO
 Original Comment #: 3 Code: C

Comment: As discussed in a phone call on November 8, 1999 with FDF personnel, OEPA feels that all suite designators for the samples should be designated before the sample collection. In doing so, the possibility of errors being made by the sampling crew can be eliminated. Please revise the document to include designators for all samples in the PSP.

Response: The suite designators were not included in Appendix B to allow for the flexibility to determine during sampling and analysis activities whether the samples would be analyzed on-site or off-site. This decision would be based on laboratory capacity and anticipated turnaround times. Samples will be containerized differently depending on their destination. For instance, if a sample will be analyzed on-site for metals and rad, a single container will be collected and the suite designator would be –RM. If the sample from this same location were to be sent off-site for analysis, separate samples would be submitted for metals and rad because they would be analyzed at two different labs. One sample would have the –R designator and the other would have the –M. In order to reduce the possibility of sample ID or suite designator errors, the field crew will utilize electronically generated Chain of Custody forms as often as possible. These forms are generated from data logged into the LIMS system prior to sample collection.

Action: None.

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DATA QUALITY OBJECTIVES

Commenting Organization: Ohio EPA

Commentator: OFFO

Section #: 7.0

Pg. #: 9 of 12

Line #:

Code: C

Original Comment #: 4

Comment: The paragraph labeled Physical Samples specifies areas in A2P3 which are not within the scope of this project. Please correct.

Response: The DQO SL-052, Sitewide Certification Sampling and Analysis without HPGe Detectors, was originally developed to support A2PIII certification activities. However, the requirements as stated in the DQO, with the exception of Section 7.0, Physical Samples, are applicable to all certification activities at the site. The text will be clarified that this portion of the DQO is not applicable to the subject certification.

Action: The text will be revised to exclude Section 7.0, Physical Samples as applicable to the certification of A1PII.

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- Topographical data from 1992 (pre-RA 14) and 1997 (post-RA 14) was compared to current topographical information for RA 14 sample locations (see attached Figure 4 for sample point locations). Excluding points 206, 207, and 208 which were in the deep excavation areas, the difference in the average depth of excavation in the A1PII STP stripping area (based on current data) and the pre-RA 14 excavation (based on 1992 data) where the remaining seven points lie is 1.1 feet. Additionally, the difference in the average depth of excavation in the A1PII STP stripping area (based on current data) and the post-RA 14 excavation (based on 1997 data) where the remaining seven points lie is 0.6 feet. This indicates that the area was not backfilled and has been stripped by 6 inches.
- The RA 14 post-closure report included analytical results from ten sample points with constituents of concern which exceeded the FRL. These points are 118, 132, 137, 140, 203, 206, 207, 208, 209, and 214. Samples were collected at three depth intervals (0 to 6-inch, 6 to 12-inch and 12 to 18-inch) in January 2000 after Sewage Treatment Plant excavation activities from each of these points with the exception of points 206 and 207. Points 206 and 207 were in the deep excavation area at approximately 12 to 15 feet below original grade. Sample point 208 was also within the deep excavation area (approximately 2 feet below grade) but was accessible and samples were collected. Analytical data from these samples reveals no uranium or thorium concentrations at any location or depth interval which exceeds the FRL. These results indicate that any contamination which remained after RA14 was at the surface and was removed during STP excavation when an additional 6 inches was stripped from these areas.
- Real time analytical data which was collected during predesign activities was compared to real time analytical data which was collected during precertification. This data shows effective removal of surface contamination and reveals no surface locations in the former RA 14 area which exceed FRL criteria for real time monitoring. This data is presented on the attached maps (Figures 1 and 2).

Responses to specific comments:

- A) The top of the native soil will be determined in the field by a geologist
- B) The Certification Units (CUs) in and around the former RA 14 area have been reconfigured to more effectively verify that all above FRL material has been removed. The attached map (Figure 4) outlines the new CU boundaries and includes an overlay of the RA 14 excavation limits. Samples will be collected in two intervals (0 to 6-inch and 6 to 12-inch) for the two CUs that cover the RA 14 excavated areas. The location of the sampling points within each CU are shown on the attached map (Figure 3)
- C) As discussed above, the on-property RA 14 excavation areas were not backfilled
- D) If any CU fails certification criteria a plan for removal of the impacted material and resampling will be developed and implemented upon approval of the regulatory agencies.

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Action: The certification report will address the above information. In addition, the appropriate changes will be made to the CDL including the following:

- Figures 1-6 (A1PII Certification Unit Design) and 4-2 (A1PII Sectors 2 and 3 Boundaries and Sample Locations) will be updated
- Section 1.2 will be revised to note that the scope includes 63 CUs: 14 in Sector 1, 21 in Sector 2, and 28 in Sector 3. (Line 4)
- Sections 4.1 and 4.1.3 will be revised to include RA 14 boundaries as a consideration for CU design and to include the CUs which cover the RA 14 footprint in the list of CUs for Sector 3
- Section 4.2, Page 4-9, Lines 25-34: This bullet will be replaced with the following:

“CUs A1P2-S3SA-09 and A1P2-S3SA-11 -During RA 14, spot excavations were performed in locations within these CUs which removed between 6 and 18 inches of soil. The Removal Action 14 Contaminated Soils Adjacent to the Sewage Treatment Plant Incinerator Final Report notes that the off-property excavations were backfilled, however, the on-property excavation areas were not backfilled. Additionally, another 6 inches of soil was removed from these areas during STP remediation activities. Precertification real time scanning, as well as additional analyses of physical samples, show no areas that exceed the FRL. Samples will be collected and analyzed at two intervals (0 to 6-inch and 6 to 12-inch) in all sixteen locations for these CUs.”

- Prior to reconfiguration of the CUs, the CG&E tower straddled the line between CUs A1P2-S3SA-08 and A1P2-S3SA-09. The CG&E tower now falls entirely in CU A1P2-S3SA-08. Two sample point locations were identified under the tower which would be collected in addition to the certification samples. These sample points will not change, however, the sample identifiers will be changed to reflect their origin in CU A1P2-S3SA-08. The following update will be made to the bullet in Section 4.2, Page 4-9, Lines 1 and 2:

“CUs A1P2-S3SA-08 – A CG&E tower is located in this CU in the 6-inch stripping area. The area under the tower was not accessible for stripping.”

Additionally, the revised CDL will include:

- The text of Section 2.2 (Precertification Data) and the figures in Appendices A, B, C, and D will be updated to include additional real time scanning
- The schedule listed in Section 5.0 will be revised to include the submittal date for the Certification Report covering the CUs east of the old North Access Road.

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Commenting Organization: Ohio EPA

Commentator: OFFO

Section #: Figure 4-2

Pg. #:

Line #:

Code: C

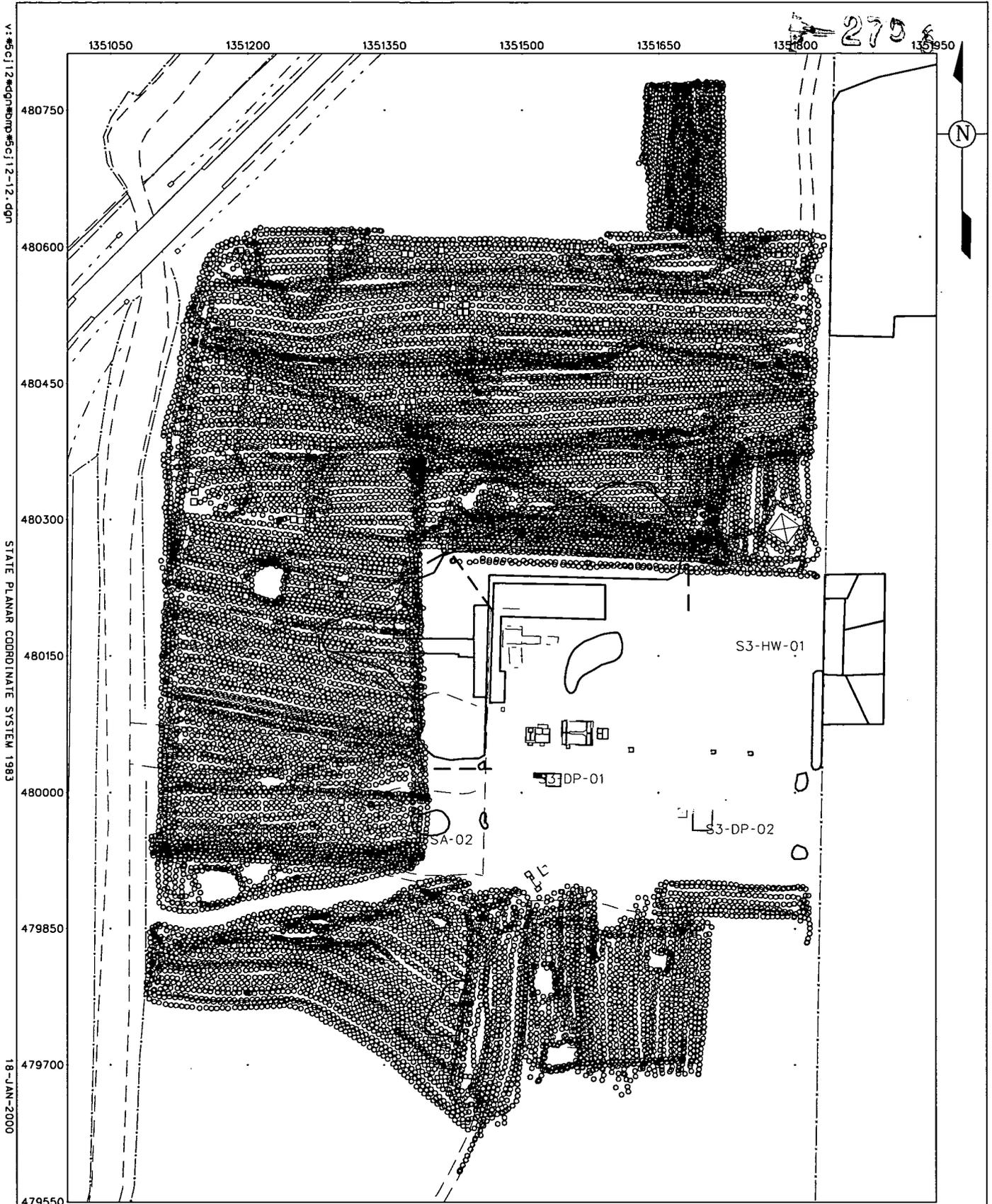
Original Comment #: 4

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

Response: The Figure will be clarified to properly identify S2-NI-05.

Action: A revised figure will be provided.

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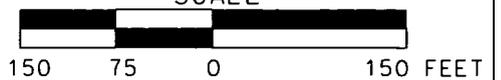
LEGEND:

- -100 to 82.00
- 82.00 to 164.00
- ▲ 164.00 to 246.00
- ☆ 246.00 to 1000.00

UNITS = ppm

TOTAL URANIUM

SCALE



DRAFT

FIGURE 2. PRECERTIFICATION DATA

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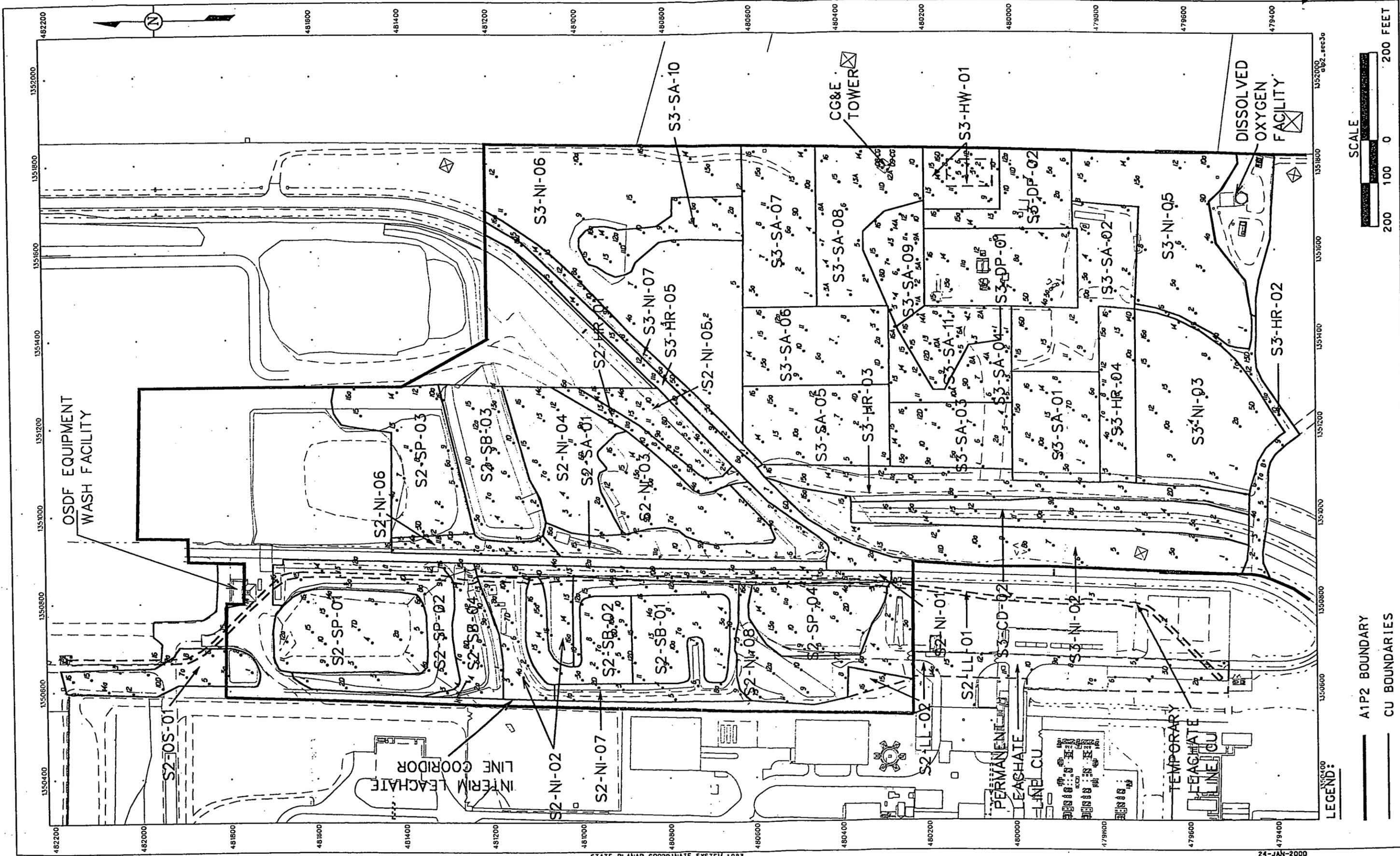
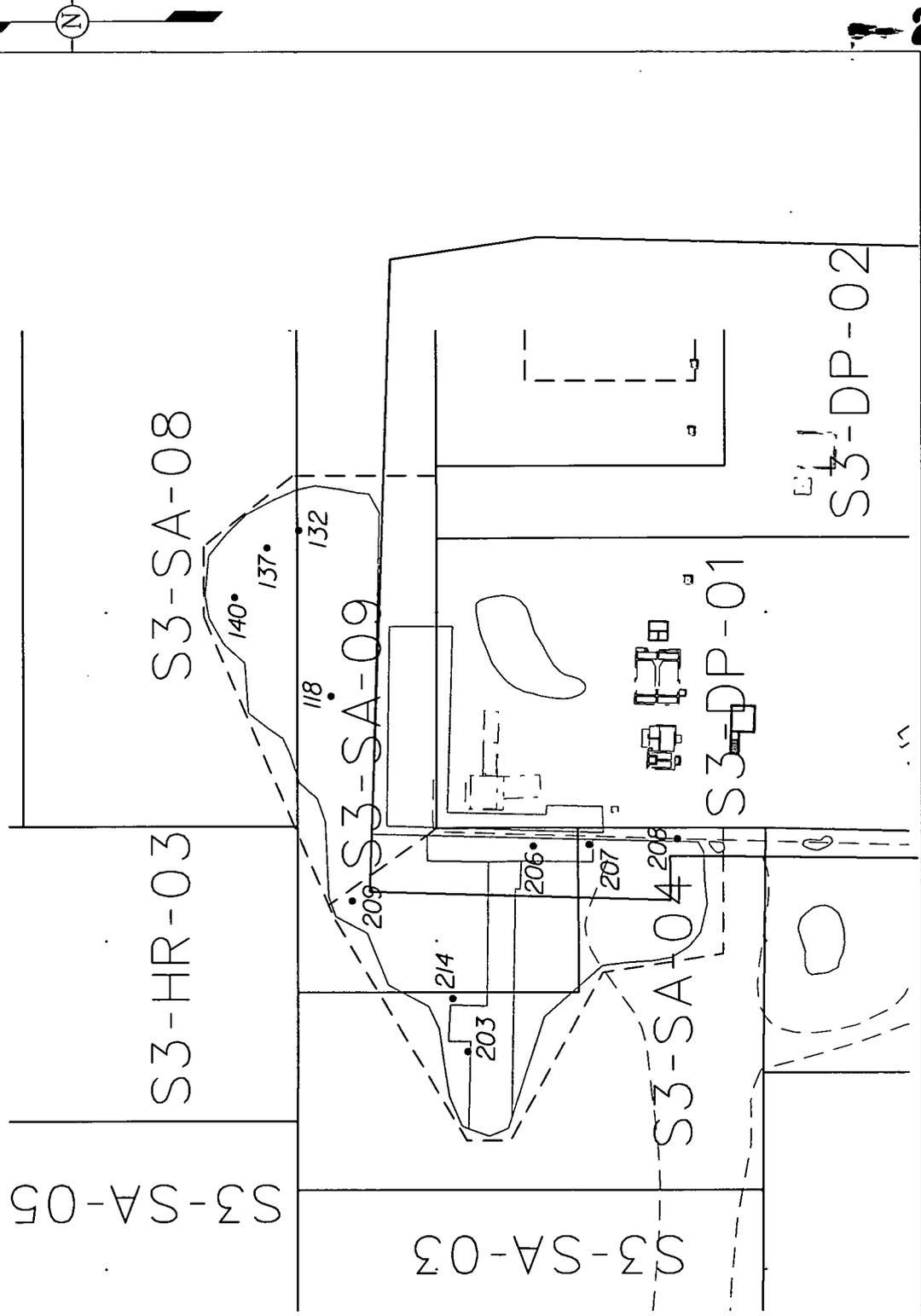


FIGURE 3 A1P1 SECTORS 2 & 3 BOUNDARIES AND SAMPLE LOCATIONS

ID	Easting	Northing
118	1351548.90	480263.28
209	1351424.50	480250.57
214	1351365.10	480190.34
132	1351650.10	480282.56
137	1351639.50	480301.75
140	1351609.30	480321.62
203	1351332.80	480181.25
206	1351457.70	480141.32
207	1351458.60	480107.23
208	1351462.10	480053.63



- LEGEND:**
- 207 SAMPLE LOCATION
 - RA 14 EXCAVATION FOOTPRINT
 - - - REVISED CU BOUNDARY



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