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George V. Voinovich
Governor

June 23, 2000

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

RE: OEPA'S COMMENTS ON THE PROJECT SPECIFIC PLAN FOR SAMPLING AREA 3A MISCELLANEOUS STOCKPILES FOR OSDF WAC ATTAINMENT

Dear Mr. Reising:

Ohio EPA has reviewed DOE's May 18, 2000 submittal on the *Project Specific Plan for Sampling Area 3A Miscellaneous Stockpiles for OSDF WAC Attainment*. The attachment provides DOE Ohio EPA's comments on the submittal.

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

Sincerely,

Donna Bohannon 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 Barker, Tetra Tech EM Inc.
Manager, TPSS/DERR,CO

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**PROJECT SPECIFIC PLAN FOR SAMPLING AREA 3A
MISCELLANEOUS STOCKPILES FOR
OSDF WAC ATTAINMENT**

Comments:

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Pg. #: Line #: Code: E
Original Comment: Appendix C is frequently referred to throughout this document as in sections 2.3.4, 2.4, and 6.0. However, these references do not apply to Appendix C and should be siting other Appendixes in the document. Please correct.

2. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.1 Pg. #:1-1 Line #:12-15 Code: C
Original Comment: Ohio EPA does not agree with the method of characterizing stockpile WAC attainment as stated in this section. Historically, and according to the SEP, *WAC attainment is a combination* of scanning, and sampling and analysis. Each excavation layer of a pile must be scanned via NaI detectors or HPGe measurements. The scans must be at a minimum frequency of 3 foot lifts.