



Department of Energy

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3103

JUL 13 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-0833-00

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 AND
U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE DRAFT
CERTIFICATION REPORT FOR AREA 1, PHASE II**

- References: 1) Letter, T. Schneider to J. Reising, "Comments - Certification Report for A1P1I," dated June 14, 2000
- 2) Letter, J. Saric to J. Reising, "A1,P2 Certification Report," dated June 30, 2000

Enclosed for your approval are responses to the Ohio Environmental Protection Agency (OEPA) and U.S. Environmental Protection Agency (U.S. EPA) comments on the draft Certification Report for Area 1, Phase II.

If you have any questions or require additional information, please contact Robert Janke at (513) 648-3124.

Sincerely,

Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

Enclosure

Mr. James A. Saric
Mr. Tom Schneider

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JUL 13 2000

cc w/enclosure:

R. J. Janke, OH/FEMP
K. Nickel, OH/FEMP
G. Jablonowski, USEPA-V, SRF-5J
T. Schneider, OEPA-Dayton (three copies of enclosure)
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
F. Hodge, Tetra Tech
AR Coordinator, Fluor Fernald, Inc./78

cc w/o enclosure:

N. Hallein, EM-31/CLOV
A. Tanner, OH/FEMP
D. Carr, Fluor Fernald, Inc./2
J. Chiou, Fluor Fernald, Inc./52-0
T. Crawford, Fluor Fernald, Inc./52-0
T. Hagen, Fluor Fernald, Inc./65-2
J. Harmon, Fluor Fernald, Inc./90
S. Hinnefeld, Fluor Fernald, Inc./31
M. Jewett, Fluor Fernald, Inc./52-2
U. Kumthekar, Fluor Fernald, Inc./65
S. Lorenz, Fluor Fernald, Inc./52-5
M. Rolfes, Fluor Fernald, Inc./60
J. Vance, Fluor Fernald, Inc./52-0
T. Walsh, Fluor Fernald, Inc./65-2
ECDC, Fluor Fernald, Inc./52-7

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT CERTIFICATION REPORT FOR AREA 1, PHASE II
(20710-RP-0016, REVISION B)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA
Section #: 2.1.5.1
Original Specific Comment #: 1

Commentor: Saric
Line #: 35

Page #: 2-6

Comment: The text cites Figure 2-5 as depicting certain certification units (CU). However, these CUs appear in Figure 2-6. Similar errors appear on Line 12 of Page 2-8 (which should cite Figure 2-5) and Line 26 of Page 2-9 (which should cite Figures 2-5 and 2-6) and may occur elsewhere. All text citations of tables and figures should be checked and corrected as necessary.

Response: Concur.

Action: All text citations for tables and figures will be checked and corrected as necessary.

Commenting Organization: U.S. EPA
Section #: 3.1.1
Original Specific Comment #: 2

Commentor: Saric
Line #: Not applicable (NA)

Page #: 3-2

Comment: The text discusses excavation and subsequent sampling activities. However, some of the text is written in the future tense even though the excavation and sampling activities have been completed. The text should be revised to discuss completed activities from the perspective of the present (that is, the report submittal date). This comment also applies to Section 3.1.2 and should be addressed.

Response: Concur.

Action: The text will be revised to discuss completed activities in the proper tense.

Commenting Organization: U.S. EPA
Appendix #: A
Original Specific Comment #: 3

Commentor: Saric
Line #: NA

Page #: NA

Comment: This appendix is difficult to use because of its lack of organization. First, it should be paginated. Second, it should have a table of contents or be organized in strict alphabetical order by CU designation. Currently, it is difficult to determine whether the appendix is complete and to locate the page or pages relevant to a specific CU. Because of the appendix's lack of pagination, the specific comments that appear below can only cite the CUs involved.

Response: Concur.

Action: Appendix A will be paginated and organized more effectively.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: Appendix A

Page #: NA

Line #: NA

Original Specific Comment #: 4

Comment: The statistical summary in the table for CU A1P2-S2NI-05 presents the maximum result for radium-228 as 2.53 picoCuries per gram (pCi/g), which is well over the final remediation level of 1.80 pCi/g. However, no test statistics have been calculated. The necessary statistical calculations should be completed to demonstrate that the CU meets the certification criteria for all radionuclides.

Response: Concur.

Action: The statistical calculations for CU A1P2-S2NI-05 will be completed and the statistical table revised appropriately.

Commenting Organization: U.S. EPA

Commentor: Saric

Appendix #: A

Page #: NA

Line #: NA

Original Specific Comment #: 5

Comment: The statistical summary for CU A1P2-S3HW-01 presents the maximum value for antimony as 0.91 milligram per kilogram (mg/kg). However, review of the data reveals that the actual maximum value is 1.20 mg/kg. There is a similar error for technetium-99 in the statistical summary for CU A1P2-S3SA-08. These and any other such errors should be identified and corrected.

Response: Concur with the correction for CU A1P2-S3HW-01. The similar error for technetium-99 is in the statistical summary for CU A1P2-S3SA-06. The statistical summary for CU A1P2-S3SA-08 is correct.

Action: The statistical summaries for CUs A1P2-S3SA-06 and A1P2-S3HW-01 will be corrected.

Commenting Organization: U.S. EPA

Commentor: Saric

Appendix #: A

Page #: NA

Line #: NA

Original Specific Comment #: 6

Comment: The table for CU A1P2-S2LL-01 includes some uranium data that are flagged with "MDC." Similar entries are present in several other tables, but in the other tables (and for the arsenic data for CU A1P2-S2LL-01), the standard qualifier "U" is used for the same purpose as "MDC." All such entries in the appendix should display a consistent qualifier.

Response: Concur.

Action: All qualifier entries in Appendix A will be modified as necessary to be consistent.

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE DRAFT CERTIFICATION REPORT FOR AREA 1, PHASE II
(20710-RP-0016, REVISION B)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

Commenting Organization: Ohio EPA
Section #: General Comment Pg. #: Line #: Commentator: OFFO
Original Comment #: 1 Code: C

Comment: This document contains many sentences in which the verb tenses do not agree. For example, lines 1-3 on page 3-3: Once the pipe and bedding material *has been* removed, the trench *was* over-excavated at the designated sample locations, and soil *will be* placed adjacent to the trench. Please change all tenses of the document to agree.

Response: Concur.

Action: The necessary verb tense corrections will be incorporated in the final version of the certification report.

Commenting Organization: Ohio EPA
Section #: General Comment Pg. #: Line #: Commentator: OFFO
Original Comment #: 2 Code: C

Comment: This certification report is not considered complete because of the failure of CU's A1P2-S1TR-01 and A1P2-S1TR-03. As stated in the SEP, Section 3.4.7, 'Upon completion of *all certification activities within a remediation area*, a formal certification report will be issued for the entire remediation area.' Please resubmit the CDL when all areas pass certification.

Response: DOE acknowledges the comment and will not resubmit the final certification report until re-certification of the failed portions of CU's A1P2-S1TR-01 and A1P2-S1TR-03 is confirmed. A discussion and confirmation that these failed portions have achieved FRLs with certification of CU A1P2-S1TR-12 will be included. As a note, DOE submitted the draft report since over 95 percent of the certification area achieved the final remediation levels.

Action: Submit final certification report after certification of the CU A1P2-S1TR-12.

Commenting Organization: Ohio EPA
Section #: 3.1 Pg. #: 3-1 Line #: 27 Commentator: OFFO
Original Comment #: 3 Code: C

Comment: Table 3-1 is missing from the document. Please include this table, which should contain all original estimates of soil quantities as well as actual amounts excavated, as previously discussed.

Response: Concur.

Action: Table 3-1 will be modified to add the estimated soil quantities and included in the document as referenced.

Commenting Organization: Ohio EPA

Commentator: OFFO

Section #: 5.1.5

Pg. #: 5-3

Line #: 2

Code: C

Original Comment #: 4

Commit: Delete the reference to A1P2-S3DP-02, as it has been determined through a phone conversation with FDF that this CU was erroneously referenced in the report.

Response: Concur.

Action: The reference will be deleted per the comment.

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