



Department of Energy

**Ohio Field Office
Fernald Area Office**
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AUG 03 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-0912-00

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 THE U.S. ENVIRONMENTAL PROTECTION AGENCY
AND OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE DRAFT
CERTIFICATION DESIGN LETTER AND DRAFT PROJECT SPECIFIC PLAN FOR AREA 1,
PHASE III PART TWO CERTIFICATION SAMPLING**

- References:
- 1) Letter, J. Saric to J. Reising, "Area 1, Phase III Part Two Certification Design Letter," dated July 31, 2000
 - 2) Letter, T. Schneider to J. Reising, "Comments on the Certification Design Letter for Area 1, Phase III Part Two," dated July 31, 2000
 - 3) Letter, T. Schneider to J. Reising, "Comments on the Project Specific Plan for Area 1, Phase III Part Two," dated July 31, 2000

Enclosed for your approval are responses to the U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) comments on the draft Certification Design Letter (CDL) and draft Project Specific Plan (PSP) for Area 1, Phase III Part Two Certification Sampling. Upon approval, these responses will be incorporated into the subject documents.

AUG 03 2000

Mr. James A. Saric
Mr. Tom Schneider

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If you have any questions regarding this document 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

Enclosure

cc w/enclosure:

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
D. Carr, Fluor Fernald, Inc./2
J. D. Chiou, 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
M. Rolfes, Fluor Fernald, Inc./60
J. Vance, Fluor Fernald, Inc./52-0
T. Walsh, Fluor Fernald, Inc./65-2
E. Woods, Fluor Fernald, Inc./65-2
ECDC, Fluor Fernald, Inc./52-7

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AUG 03 2000

Mr. James A. Saric
Mr. Tom Schneider

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bcc w/enclosure:
R. J. Janke, OH/FEMP
M. Davis, ANL

bcc w/o enclosure:
A. Tanner, OH/FEMP

000003

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT CERTIFICATION DESIGN LETTER FOR AREA 1, PHASE III PART TWO
(20720-RP-0002, REVISION A)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA
Section #: 2.1
Original Specific Comment #: 1

Commentor: Saric
Line #: Not applicable

Page #: 2-5

Comment: The second and third columns of Table 2-1 are unclear. For instance, some data entries for arsenic and beryllium in the second and third columns have two subcells, but others have only one. Some of these entries may be sampling information for Area 1, Phase III Part Two, and others may be sampling information for the adjacent Fire Training Area. The table should be revised to make this distinction—or whatever distinction is intended—clear.

Response: Concur. The data from the Fire Training Facility was lightly shaded, however, this shading was not clear in the copied documents.

Action: The data for the Fire Training Facility has been indicated with asterisks. This change will be incorporated into the final document.

Commenting Organization: U.S. EPA
Section #: 4.1
Original Specific Comment #: 2

Commentor: Saric
Line #: 4 and 5

Page #: 4-2

Comment: The text states that “the allowable minimum distance between pairs ranged from 10.5 feet in certification unit (CU) A2P3-PT2-C-3 to 486.1 feet in CU A2P3-PT2-C-3.” The first CU cited should be changed to A2P3-PT2-C-2, the CU with the smallest area. In addition, because CU A2P3-PT2-C-3 is about 800 feet long, the allowable minimum distance number between pairs of 486.1 feet presented for this CU is erroneous. The calculations of allowable minimum distances and related quantities should be checked and the text, figures, and tables should be corrected as necessary.

Response: Concur. The original statement is incorrect. The text should read: “The allowable minimum distance between pairs ranged from 25.2 feet in CU A1P3P2-C-02 to 56.0 feet in CU A1P3P2-C-03.”

Action: The text will read: “The allowable minimum distance between pairs ranged from 25.2 feet in CU A1P3P2-C-02 to 56.0 feet in CU A1P3P2-C-03.” This change will be incorporated into the final version of the document.

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**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE DRAFT CERTIFICATION DESIGN LETTER FOR AREA 1, PHASE III PART TWO
(20720-RP-0002, REVISION A)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENTS

Commenting Organization: Ohio EPA
Section #: Pg. #: Line #: Commentator: OFFO
Code: C

Original Comment #: 1

Comment: During a field visit on July 27, 2000 Ohio EPA personnel noticed that the part of A1P3P2-C-01 CU which falls north of gravel roadway is marked as Certified. According to the FEMP Controlled Certification Map on June 13, 2000, this area is not certified. Please clarify.

Response: Concur. The certification fence is incorrectly located in the field. The FEMP Controlled Certification Map is correct as shown.

Action: The fence will be correctly relocated prior to completion of certification.

Commenting Organization: Ohio EPA
Section #: Pg. #: Line #: Commentator: OFFO
Code: C

Original Comment #: 2

Comment: Ohio EPA walked down the area north of the gravel road which is part of A1P3P2-C-01 CU on July 27, 2000. At least one sinkhole with visible pipe at the bottom was found. There is no mention of any pipelines in the document. Considering the close proximity of the Former Fire Training Facility, it would appear more investigation is in order.

Response: A sinkhole approximately 10 feet in diameter exists in the southwestern corner of A1P3P2-C-01. At the bottom of the sinkhole, sections of 4-inch and 8-inch clay drainage pipes (farmer's drain tiles) are exposed. These drainage pipes empty into the ditch at the border with Area 1, Phase I. Drainage in the area flows generally in a southward direction from previously certified areas, therefore the pipes are not expected to be a source of contamination. A review of utility design maps shows no underground utilities in the area.

Action: None. These pipes will be left in place unless remediation of the area is required based on attainment of certification criteria.

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**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE DRAFT PROJECT SPECIFIC PLAN FOR CERTIFICATION SAMPLING
OF AREA 1, PHASE III PART TWO
(20720-PSP-0002, REVISION A)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENTS

Commenting Organization: Ohio EPA
Section #: Pg. #: Line #: Commentator: OFFO
Code: C

Original Comment #: 1

Comment: During a field visit on July 27, 2000 Ohio EPA personnel noticed that the part of A1P3P2-C-01 CU which falls north of the gravel roadway is marked as Certified. According to the FEMP Controlled Certification Map of June 13, 2000, this area is not certified. Please clarify.

Response: Concur. The certification fence is incorrectly located in the field. The FEMP Controlled Certification Map is correct as shown.

Action: The fence will be correctly relocated prior to completion of certification.

Commenting Organization: Ohio EPA
Section #: Pg. #: Line #: Commentator: OFFO
Code: C

Original Comment #: 2

Comment: Ohio EPA walked down the area north of the gravel road which is part of A1P3P2-C-01 CU on July 27, 2000. At least one sinkhole with visible pipe at the bottom was found. There is no mention of any pipelines in the document. Considering the close proximity of the Former Fire Training Facility, it would appear more investigation is in order.

Response: A sinkhole approximately 10 feet in diameter exists in the southwestern corner of A1P3P2-C-01. At the bottom of the sinkhole, sections of 4-inch and 8-inch clay drainage pipes (farmer's drain tiles) are exposed. These drainage pipes empty into the ditch at the border with Area 1, Phase I. Drainage in the area flows generally in a southward direction from previously certified areas, therefore the pipes are not expected to be a source of contamination. A review of utility design maps shows no underground utilities in the area.

Action: None. These pipes will be left in place unless remediation of the area is required based on attainment of certification criteria.

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SPECIFIC COMMENT

Commenting Organization: Ohio EPA

Commentator: OFFO

Section #: 2.2

Pg. #: 2-1

Line #: 30

Code: C

Original Comment #: 3

Comment: This line incorrectly references Table 3-1 for the TAL parameters. The correct table is 3-2. Please correct.

Response: Concur.

Action: This change will be incorporated into the final version of the PSP.

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