



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

September 26, 2000

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

RE: PSP FOR PADDYS RUN AND ADJACENT AREAS REAL-TIME SCAN

Dear Mr. Reising:

This letter provides as an attachment Ohio Environmental Protection Agency comments on the Project Specific Plan.

This Plan is fundamentally different from most of the PSPs that have recently been submitted for our review. The objective of the Plan is more closely akin to a Remedial Investigation in that determining the nature and extent of contamination is a major goal. Recent plans have instead focused on the refinement of excavation details or WAC attainment, to name two examples. For these reasons, we have not commented in detail on important issues such as re-contamination of areas after they have been scanned or movement of contamination by high flows in Paddys Run. Neither have we commented in detail about potentially contaminated debris used historically to stabilize the banks of Paddys Run. All of our comments are being made under the assumption that all

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Mr. Johnny Reising
September 26, 2000
Page 2

anthropogenic items will be removed from Paddys Run during remediation.

If you have any questions, please contact Tom Ontko or me.

Sincerely,



Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Francie Hodge, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

Ohio Environmental Protection Agency Comments
on the Project Specific Plan for
Paddys Run and Adjacent Areas Real-Time Scan

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.0 Pg #: 1-1 Line #: 3 Code: c
Comment: The purpose of this Plan only became apparent after several readings and a phone call. We suggest changing the second sentence to read, "The data collected under this plan will be used to assess radiological contamination and to estimate the volume of sediments that will need to be excavated to reach FRLs within Paddys Run and the adjacent oxbow areas."
- 2) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 1.1 Pg #: 1-1 Line #: 24 Code: C
Comment: Please include a copy of the map with this document.
- 3) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 1.2 Pg #: 1-2 Line #: 12-14 Code: C
Comment: It would appear that any area down gradient from an area not certified would require reiterative scanning. The pilot plant drainage ditch is given as an example, but the impression is that only the area immediately adjacent to this area may require reiterative scanning when in fact any area down gradient could be affected by the non-certified area upgrading. Additionally, the northern oxbow has received overflows from the K-65 concrete sump and may again in the future. Although it is stated in section 1.3 that complete precertification surface coverage will be conducted when up gradient areas are certified, further discussion should be included on the difference in purpose between the objectives of this plan and the complete precertification.
- 4) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.0 Pg #: Line #: Code: c
Comment: The Plan does not specify a time-frame to accomplish the field activities. An explanation of the anticipated duration of the scanning should be added. A listing of contingencies that might delay the completion of the scanning could be included if a commitment to a completion date can not be made.
- 5) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 2.0 Pg #: 2-1 Line #: 21-25 Code: C
Comment: It appears as though the two pieces of equipment listed may not be appropriate for soil moisture measurements in Paddys Run and its riparian areas. The

Ohio EPA Comments
Paddys Run Real-Time Scan
Page 2

Troxler 3440 series is designed for compaction control for road building. The Zeltex KJE-100 is designed for use in manufacturing. A more appropriate measurement instrument would be designed for soil moisture such as the Mesa Systems Trime-FM. Please send procedures EQT-32 and EQT-39 with appropriate explanations of how these are suitable for soil moisture in Paddys Run and its riparian areas.

- 6) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 2.6 Pg #: 2-8 Line #: 9 Code: DSW
Comment: Because of the extremely variable nature of the Paddys Run stream bed, 2 soil moisture measurements per acre is insufficient. Soil moisture should be measured in the immediate area of the radiological measurements. Also see earlier comment regarding soil moisture measurement equipment.