



Department of Energy

Ohio Field Office
Fernald Area Office

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



3571

20 MAR 2001

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-0425-01

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 COMMENT RESPONSES ON THE DRAFT SITE-WIDE EXCAVATION
PLAN ADDENDUM, DRAFT CERTIFICATION DESIGN LETTER AND DRAFT PROJECT
SPECIFIC PLAN FOR AREA 9, PHASE I CERTIFICATION SAMPLING AND TRANSMITTAL
OF THE REVISED SITE-WIDE EXCAVATION PLAN ADDENDUM**

- References:
- 1) Letter, T. Schneider to J. Reising, "Conditional Approval – CDL for A9PI," dated February 22, 2001
 - 2) Letter, T. Schneider to J. Reising, "Conditional Approval – PSP for A9PI," dated February 22, 2001
 - 3) Letter, J. Saric to J. Reising, "A9, PI CDL, Certification Sampling PSP, and SEP Addendum," dated March 2, 2001

This letter transmits the responses to the U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) comments on the following documents:

- Draft Certification Design Letter (CDL) for Area 9, Phase I (A9PI; January 2001)
- Draft Project Specific Plan (PSP) for Area 9, Phase I Certification Sampling (January 19, 2001)
- Draft Addendum to the Site-wide Excavation Plan (SEP Addendum; January 2001)

Also included in this transmittal for your review is the revised SEP Addendum. The SEP Addendum proposes the approach for conducting precertification and certification activities in off-property cultivated areas. This Addendum has been revised per the verbal comments received from the U.S. EPA and OEPA.

In order to lessen confusion that was caused by the phrase "background certification," the phrase "baseline confirmation" is now being used in all the above-listed documents. The new phrase is defined in the first paragraph of the SEP Addendum.

As a result of delays outside of our control in obtaining access to the A9PI property, a revised schedule for A9PI certification activities is necessary. The previous schedule is included in the A9PI CDL, Section 5.0. The revised schedule is as follows.

<u>Activity</u>	<u>Previous Date</u>	<u>Revised Date</u>
Submittal of Certification Design Letter	January 19, 2001	January 19, 2001
Start of Certification Sampling	March 5, 2001	October 1, 2001
Complete Field Work	May 18, 2001	December 14, 2001
Complete Analytical Work	June 29, 2001	January 25, 2002
Complete Data Validation and Statistical Analysis	July 27, 2001	February 22, 2002
Submit Certification Report	September 17, 2001	April 12, 2002

This new schedule assumes that the access agreement will be obtained during the upcoming growing season, and sampling can be conducted following the harvesting of the crops. Following regulatory concurrence with the comment responses and the proposed revisions to the SEP Addendum and schedule, the A9PI CDL and PSP will be revised for final distribution.

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

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

Enclosures

Mr. James A. Saric
Mr. Tom Schneider

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cc w/enclosures:

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

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cc w/o enclosure:

N. Hallein, EM-31/CLOV
J. Ebersole, DOE/OH
K. Nickel, OH/FEMP
J. Reising, OH/FEMP
C. Summe, Landowner
T. Buhrlage, Fluor Fernald, Inc./29
D. Carr, Fluor Fernald, Inc./2
M. Cherry, Fluor Fernald, Inc./52-2
J. D. Chiou, Fluor Fernald, Inc./52-0
M. Frank, Fluor Fernald, Inc./90
T. Hagen, Fluor Fernald, Inc./65-2
S. Hinnefeld, Fluor Fernald, Inc./31
M. Hnatov, Fluor Fernald, Inc./90
M. Jewett, Fluor Fernald, Inc./52-2
L. Ludwick, Fluor Fernald, Inc./65-2
M. Rolfes, Fluor Fernald, Inc./52-0
J. Schwing, Fluor Fernald, Inc./52-0
J. Vance, Fluor Fernald, Inc./52-0
T. Walsh, Fluor Fernald, Inc./46
E. Woods, Fluor Fernald, Inc./65-2
ECDC, Fluor Fernald, Inc./52-7

bcc w/enclosure:

R. J. Janke, OH/FEMP
M. Davis, ANL

bcc w/o enclosure:

A. Tanner, OH/FEMP

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE DRAFT CERTIFICATION DESIGN LETTER FOR AREA 9, PHASE I
(21120-RP-0002, REVISION A)

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENT

Commenting Organization: Ohio EPA
Section #: 4.3.2 Pg. #: 13 Line #: 29-30 Commentator: OFFO
Original Comment #: 1 Code: C
Comment: This line needs to reference Section 3.4.5 of the SEP, Procedures for Non-Attainment Scenarios, which defines what portion of the area will be considered impacted.
Response: Agree.
Action: The text will be edited to include reference to the SEP, Section 3.4.5, Procedures for Non-Attainment Scenarios.

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE DRAFT PROJECT SPECIFIC PLAN FOR
AREA 9, PHASE I CERTIFICATION SAMPLING
(21120-PSP-0003, REVISION A)

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENT

Commenting Organization: Ohio EPA Commentator: OFFO

Section #: 4.1 Pg. #: 4-1, 4-2 Line #: 40-41, 1 Code: C

Original Comment #: 1

Comment: These two bullet points reference changing the PSP. This is not acceptable. Once the PSP has been approved by the Agencies, V/FCNs are the only acceptable method for documenting change to the original design. Please correct.

Response: Agree.

Action: The first bullet will be revised as follows: "A variance to the PSP will be written to document references confirming that the new method supports data needs." The second bullet will be revised as follows: "variations from the SCQ methodology are documented in a variance to the PSP."

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT CERTIFICATION DESIGN LETTER FOR AREA 9, PHASE I
(21120-RP-0002, REVISION A)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 4.1

Page #: 11

Line #: 14 and 15

Original Specific Comment #: 1

Comment: The text states that four of the sixteen sampling locations in each certification unit (CU) are designated with a "V," indicating archive sampling locations. However, archive sampling locations are indicated with an "A" in Figure 5. The text and figure should refer to archive sampling locations consistently.

Response: Agree.

Action: Figure 5 will be revised. A "V" will be used in place of the "A". The same changes will be made to Figure 2-1 in the Project Specific Plan for Area 9, Phase I Certification Sampling.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 4.1

Page #: 11 and 12

Line #: Not Applicable

Original Specific Comment #: 2

Comment: The text states that at each of the four archive sampling locations, a composite sample will be collected from 12 to 36 inches and that these samples will be designated as background certification samples in accordance with Section 3.4.8 of the Sitewide Excavation Plan Addendum. It is unclear why only four out of the 16 locations within each CU are being selected as background certification sampling locations instead of 12 locations as required by the "Sitewide Excavation Plan" for final remediation level certification. The text should be revised to provide justification for selecting only four background certification sampling locations per CU.

Response: Agree.

Action: The following text will be provided in the SEP Addendum, Section 3.4.8.
"At least 40 samples will be collected in a property to conduct population-to-population comparisons to the background subsurface data. The first step of the baseline confirmation will be based on population statistics using all of the baseline confirmation samples collected in a property as a data set due to the relatively wide range of the background conditions, as compared to an individual CU area. This differs from FRL certification, which is based on meeting a single standard (value). In addition, this approach also allows for more concentrated sampling under the more likely impacted areas where the smaller Group 1 CUs are established."

The additional text justifies the collection of baseline confirmation samples from only four of the 16 locations per CU in Area 9, Phase I. Because the CDL references the SEP Addendum, no change to the CDL will be required.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 4.1

Page #: 12

Line #: 1 and 2

Original Specific Comment #: 3

Comment: The text states that "all four 12 to 36-inch samples will be analyzed for subsurface certification purposes to background concentrations." The meaning of this sentence is unclear. The text should be revised to clarify this statement.

Response: Agree.

Action: The text will be revised to read "All four 12 to 36-inch interval samples will be analyzed for baseline confirmation purposes."

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT ADDENDUM TO THE SITEWIDE EXCAVATION PLAN
(2500-WP-0028, ADDENDUM 1, REVISION A)

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FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.4.8

Page #: 3-40

Line #: 16 and 17

Original Specific Comment #: 4

Comment: The text indicates that in the precertification phase a COC comparison with background will be conducted layer by layer (6 to 12-inch, 12 to 18-inch, and 18 to 24-inch, etc.) and that the depth of the impacted zone will be determined by this comparison. The certification sampling procedure proposed allows for comparisons with background either layer by layer or using the entire interval. What is the reason for this inconsistency?

Response: The layer-by-layer comparisons are conducted during precertification activities to determine the depth of the impacted zone. During baseline confirmation, the entire sample interval for the non-impacted zone will be composited and analyzed. The larger sample interval and a larger data set will be used for baseline confirmation due to the wide range of the background data set that is used for comparison.

Action: The text describing the baseline confirmation process will be revised to state that the entire sample interval will be composited. The option for layer by layer comparisons during certification will be deleted.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.4.8

Page #: 3-40

Line #: 26 and 27

Original Specific Comment #: 5

Comment: The text states that at least four of the final remediation level certification sampling locations per CU will be designated as background certification sampling locations. However, justification for only collecting four background certification samples and the conditions under which more than four samples may be necessary are not discussed. The text should be revised to explain when only four background certification sampling locations per CU is appropriate and when additional locations may be needed.

Response: Agree. See Response to Comment No. 2.

Action: See Action for Comment No. 2.

Commenting Organization: U.S. EPA

Section #: 3.4.8

Page #: 3-40

Commentor: Saric

Line #: 29 and 30

Original Specific Comment #: 6

Comment: The text states that the background certification sample intervals can be either randomly chosen at depth or the entire background interval can be composited. A specific approach must be specified, or further justification provided for proposing a random or composite approach.

Response: Agree.

Action: The text will be revised to state that the entire interval will be composited. Refer to Action described in Comment No. 4.

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RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT PROJECT SPECIFIC PLAN FOR
AREA 9, PHASE I CERTIFICATION SAMPLING
(21120-PSP-0003, REVISION A)

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENT

Commenting Organization: U.S. EPA

Section #: 2.3.2

Page #: 2-3

Commentor: Saric

Line #: 7 and 8

Original Specific Comment #: 7

Comment: The text states that four 12 to 36-inch interval samples from each CU (four total) will be collected for analysis and designated as background certification samples. However, justification for only collecting four background certification samples and the conditions under which more than four samples may be necessary are not discussed. The text should be revised to explain when only four background certification sampling locations per CU is appropriate and when additional locations may be needed.

Response: Agree. See Response to Comment No. 2.

Action: See Action to Comment No. 2.