



State of Ohio Environmental Protection Agency

3756

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June 21, 2001

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

**RE: COMMENTS ON THE PROJECT SPECIFIC PLAN FOR SAMPLING OF MISCELLANEOUS AREAS FOR OSDF WAC ATTAINMENT**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's May 24, 2001 submittal on the "PSP for Sampling of Miscellaneous Areas for OSDF WAC Attainment. Attached are Ohio EPA's comments on the document.

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

Sincerely,

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 Hodge, Tetra Tech EM Inc.

**PSP FOR SAMPLING OF MISCELLANEOUS  
AREAS FOR OSDF WAC ATTAINMENT.**

1. Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 3.0                      Pg #: 3-1 - 3-3                      Line #:                      Code: c  
Comment: This section states that the operational history of the SWL has not been well documented, but materials found are listed in the operational records. Due to the nature and variety of wastes reported and because this area was once a landfill, samples collected should include VOCs.
  
2. Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 4.3                      Pg #: 4-1 to 4-2                      Line #:                      Code: c  
Comment: Due to the history of the Fire Training Facility and the lack of data and information in this PSP, regarding the pre and post excavation samples, one sample is inadequate to characterize for WAC in this area. A sampling approach should be used to establish the number of samples to be collected. In addition, after Ohio EPA's review of RA 28, it was concluded that Tc-99 must be added to the WAC sampling parameters for the FTF.
  
3. Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: Appendix A                      Pg #: Table A-3                      Line #:                      Code: c  
Comment: This table lists the depth for the sample of 4-Nitroaniline in the former Fire Training Facility as 'surface'. After reviewing the May 1995 Final Report on the Contamination at the Fire Training Facility Removal Action No. 28, it would appear that backfilling, to the maximum depth of 2 feet, occurred in the area of this sample. Therefore, sampling must occur at the top of the native soils, not in the surface. Please correct.
  
4. Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: Figure 3-1                      Pg #:                      Line #:                      Code: c  
Comment: Historical boring locations in the Solid Waste Landfill Area contain many data gaps, such as in the southwest area and the central area. Sampling will need to occur in this area for WAC verification. Also, no mention is made of the leachate which has been found flowing out of the landfill. Is this leachate located in the area of the already planned sampling locations? If it is not, then WAC sampling will need to be performed in the area of the leachate.