



State of Ohio Environmental Protection Agency

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February 12, 2002

Mr. Johnny Reising
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, OH 45329-8705

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RE: PSP FOR DELINEATING KNOWN EXCEEDANCES OF THE OSDF WASTE ACCEPTANCE CRITERIA IN AREAS 3B/4B/5

Dear Mr. Reising:

Ohio EPA has reviewed the Project Specific Plan for Delineating Known Exceedances of the On-Site Disposal Facility Waste Acceptance Criteria in Areas 3B/4B/5, 20810-PSP-0004 Rev. A Draft, submitted by DOE on January 11, 2002. Ohio EPA's comments are enclosed.

If there are any questions, please contact me at (937) 285-6466 or Michelle Waller at (937) 285-6454.

Sincerely,

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

cc: Jim Saric U.S. EPA
Terry Hagen, Fluor Daniel Fernald
Francis Hodge, Tetrattech
Ruth Vandegrift, ODH
Mark Schupe, HSI Geotrans

**PSP FOR DELINATING KNOWN EXCEEDANCES OF THE
ON-SITE DISPOSAL FACILITY WASTE
ACCEPTANCE CRITERIA IN AREAS 3B/4B/5**

1. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.3 Pg. #: 1-2 Line #: 8-14 Code: C
Original Comment #
Comment: The scope of the investigative sampling for Areas 3B/4B/5 has been broken down into several segments and documents already. Is there a specific reason why these projects are being separated in this manner? OEPA feels that it is much more beneficial to have one larger sampling plan which will show both AWAC and FRL investigations simultaneously, as was done in the PSP for Area 3A/4A Subsurface Predesign Investigation. With numerous documents, as is presented here, the likelihood of important details and information being lost increases greatly. Also, it makes it very difficult to ensure adequate coverage with this piecemeal approach. Please clarify.

2. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.1 Pg. #: 2-1 Line #: Third Bullet Code: C
Original Comment #:
Comment: Due to the historical evidence of Tc-99 in the locations of the former production area, possible data gaps may exist in this project from lack of Tc-99 data, and the mobility of Tc-99. Ohio EPA believes that additional Tc-99 sampling is needed. Collecting additional samples now would avoid resampling the same areas in the future for Tc-99 determination. It would also appear to be more cost effective to collect as much data as possible in one sampling round, so the information can be used later.

3. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.1.2 Pg. #: 2-3 Line #: 1-4 Code: C
Original Comment #:
Comment:
A.) This section states that there will not be a boring 15 feet north of 1199 because it would be inside Plant 6. To follow the prescribed method of '5 feet and 15 feet', it would appear to make the most sense to sample as close to the Plant 6 building as possible.
B.) Also, this section states 'the above-WAC soil likely does not extend beneath the building'. How was this assumption made? As contamination has been known to extend under other buildings and pads onsite, this seems like an unjustified assumption without more data. Is there more sampling data then presented in this package?

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4. Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.1.5 Pg. #: 2-4, 2-5 Line #: 33-37, 1-2 Code: C
 Original Comment #:
 Comment: This section states the borings around Zone I-66 will not be collected 15 feet out. It is clear that these samples cannot be collected north or east because of the location near the Lab Building. Samples south and west can and should be collected to follow the sampling procedure used throughout the document. While there is an RI/FS data point (1266) located in the vicinity of what would be the western sample point, several other locations are being sampled in this document regardless of nearby BWAC RI/FS samples. Please be consistent and add the south and west sample locations
5. Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.2 Pg. #: 2-6 Line #: 7-17 Code: C
 Original Comment #
 Comment:
 A.) OEPA has never seen this method of including additional soil in a previously defined interval, or assigning an interval to less than a 6-inch sample and rounding. No similar approach was presented in sampling other areas of the production area. What method was used in other production area samples?
 B.) OEPA also takes issue with the attitude that a non-precise sampling interval will 'not be significant' after reviewing the extremely detailed excavation plans for 3A/4A.
6. Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.2 Pg. #: 2-7 Line #: 17-19 Code: C
 Original Comment #
 Comment: Sentences 17-19 discusses "insufficient soil mass" in regards to the collection of a sampling interval. In the past sampling protocol has always seemed to follow collecting additional soil from an identical interval by adding another push next to the original location, rather than collecting soil from an adjoining interval to make up the difference. Ohio EPA believes that collecting a sample for one interval via an adjoining interval could become inaccurate and possibly confusing during the actual sample collection. Please provide clarification on this issue and an example of when this was used in the past.
7. Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.2 Pg. #: 2-7 Line #: 21-23 Code: C
 Original Comment #

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Comment: Please provide clarification regarding why the lithological characterization will not be recorded during this sampling investigation. Have the logs been previously recorded?

8. Commenting Organization: OEPA Commentor: OFFO
 Section #: 2-5 Pg. #: 2-5 Line #: 7-9 Code: C
 Original Comment #:
 Comment: How were these sampling locations picked? They do not follow the sampling procedure listed in the document, and no reasoning is given for the locations.
9. Commenting Organization: OEPA Commentor: OFFO
 Section #: Figure 2-3 Pg. #: Legend Line #: Code: C
 Original Comment #
 Comment: Please make corrections to the "Legend." The "symbol" for the RI/FS results is switched with the "symbol" for the Proposed Boring Location.
10. Commenting Organization: OEPA Commentor: OFFO
 Section #: 3.4 Pg. #: 3-2 Line #: 21-26 Code: C
 Original Comment #
 Comment: This section discusses how changes will be implemented via V/FCN. In previous PSPs, the QA section has used language that refers to the V/FCN must be approved by Ohio EPA before implementing changes. Changes are defined as "significant" and "non-significant" and the definitions are made clear in the Proposed SDFP Sampling PSP Planning Guidelines.
11. Commenting Organization: OEPA Commentor: OFFO
 Section #: Appendix D Pg. #: D-1 Line #: Code: C
 Original Comment #:
 Comment: The RMDL's for this sampling are set at high numbers because this PSP only covers AWAC samples. Although the intention of this PSP is only for WAC attainment, OEPA finds no reason not to set the RMDL's low enough to be used for FRL sampling. It would be more in line with the sitewide goal of expediated remediation to collect as much data as possible in one sampling round, so it can be used for future investigations.