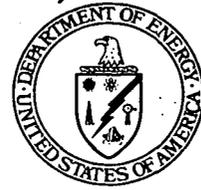


**Department of Energy**

**Ohio Field Office  
Fernald Area Office**

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

42184



APR 19 2002

Mr. James A. Saric, Remedial Project Manager  
United States Environmental Protection Agency  
Region V, SRF-5J  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

DOE-0439-02

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5<sup>th</sup> Street  
Dayton, OH 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE DRAFT PROJECT SPECIFIC PLAN FOR WASTE PITS REMEDIAL ACTION PROJECT INVESTIGATION OF THE DISPOSAL OF NATIONAL ELECTRIC COIL SOLVENT**

Reference: Letter, J. Saric to J. Reising, "Transmittal of Comments on the Draft Project Specific Plan for Waste Pits Remedial Action Project Investigation of the Disposal of National Electric Coil Solvent," dated March 4, 2002

Enclosed for your review and approval are the responses to the U. S. Environmental Protection Agency comments on the draft Project Specific Plan (PSP) for the Waste Pits Remedial Action Project (WPRAP) Investigation of the Disposal of National Electric Coil Solvent. Also enclosed is a change page to the PSP, which incorporates changes cited in the comment response document.

If you have any questions please contact John Kappa at (513) 648-3149.

Sincerely,

Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Kappa

Enclosures: As stated

Mr. James A. Saric  
Mr. Tom Schneider

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DOE-0439-02

cc w/enclosures:

R. Greenberg, EM-31/CLOV  
N. Hallein, EM-31/CLOV  
J. Kappa, OH/FEMP  
D. Lojek, OH/FEMP  
T. Schneider, OEPA-Dayton (three copies of enclosures)  
G. Jablonowski, USEPAV, SRF-5J  
F. Bell, ATSDR  
M. Shupe, HIS GeoTrans  
R. Vandegrift, ODH  
M. Wojciechowski, Tetra Tech  
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:

A. Tanner, OH/FEMP  
D. Carr, Fluor Fernald, Inc./MS2  
D. Dalga, Fluor Fernald, Inc./MS52-1  
T. Hagen, Fluor Fernald, Inc./MS65-2  
R. Houchins, Fluor Fernald, Inc./MS52-1  
T. Walsh, Fluor Fernald, Inc./MS46  
B. Westerman, Fluor Fernald, Inc./MS52-1  
D. Zdelar-Bush, Fluor Fernald, Inc./MS-52-1  
ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY  
TECHNICAL REVIEW COMMENTS ON THE  
DRAFT PROJECT SPECIFIC PLAN FOR WASTE PITS REMEDIAL ACTION PROJECT  
INVESTIGATION OF THE DISPOSAL OF NATIONAL ELECTRIC COIL SOLVENT.  
(10000-PSP-0001, REVISION A)**

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT**

**SPECIFIC COMMENTS**

Commenting Organization: U.S. EPA

Commentator: Saric

Section #: Not Applicable (NA)

Pg. #: NA

Line #: NA

Original General Comment #: 1

**Comment:** The text provides for drilling one transect of seven boreholes but includes no contingency plan for drilling additional boreholes. Additional boreholes would be needed in two cases. First, if the planned sampling and analysis reveal evidence of National Electric Coil (NEC) solvent contamination, it will be necessary to define the extent of the contamination and to estimate the volume of soil requiring special treatment and handling. Both could be accomplished by drilling one or more rings of additional boreholes around the boreholes where evidence of contamination is found. Second, the sample analytical results may be negative or may indicate only negligible contamination. In this case, additional parallel transects of boreholes should be drilled to define the entire length of the trench. If significant contamination is found in any of the new boreholes, the first contingency plan described above should be followed. If significant contamination is still not found, additional boreholes should be drilled along the center of the trench between the transects. This second contingency plan may provide adequate evidence of the absence of NEC solvent contamination. The project specific plan should be revised to include the two contingency plans described above in order to adequately determine the extent or absence of NEC solvent contamination. Either contingency plan could be activated using the variance/field change notice system; and additional project specific plans would not (be) required.

**Response:** Per discussions between Jim Saric and Terry Hagen conducted on April 9, 2000 at the Fernald Site, it was agreed that the need for contingency sampling will be determined following a review of the data collected under this PSP. This approach is currently reflected in the PSP and will address both sampling contingencies proposed in the comment should the need arise. Specifically, in regards to the first sampling contingency presented in the comment, Section 1.4 of the draft PSP states that "Following a review of initial investigation results, additional borings and samples may be necessary to vertically and laterally bound a solvent contamination area. Any required additional boring and sampling activities will be identified by a Variance/Field Change notice to this PSP."

The suggested second sampling contingency presented in the comment, conducting additional parallel boring transects, as well as possible additional boreholes along the center of the projected trench location between transects, is unnecessary for inclusion in the PSP at this time. Section 1.1 states that "Following completion of the investigation planned in this PSP, all associated information, including the laboratory analytical data, field screening results, area topography, soil lithology, and non-soil material identified in the boring cores, will be evaluated to determine if further investigation is necessary. The conclusions from this evaluation, along with the resulting data and any proposed further investigation or isolation and management efforts, will be prepared in a report provided to the regulatory agencies for joint review with WPRAP management."

The location of the proposed group of seven transect borings was chosen because it provides the best probability of determining if a disposal trench containing NEC solvent exists between the Burn Pit and Pit 3. Confidence in identifying the disposal trench, using the proposed approach, is based on consideration of numerous factors, including:

- eyewitness descriptions of the trench as located between the Burn Pit and Pit 3, having dimensions of 6-8 feet deep, 8-10 feet wide, and no less than 100 feet long
- location of the transect borings within the approximate center of an electromagnetic anomaly identified during RI/FS investigation
- situating the borings along a straight line between two CIS borings, one of which appears to be within Pit 3 and the other within the Burn Pit
- spacing the boreholes every five feet

Given the size of the trench and the limited area which exists between Pit 3 and the Burn Pit, if the trench is not identified at the proposed line of borings, it is highly unlikely that it would be detected anywhere else in that area. In addition, because the exact north-south position of the trench is not known, placing borings at the center of the trench will be nearly impossible.

Action: None

Commenting Organization: U.S. EPA

Commentator: Saric

Section #: 1.1

Pg. #: 1-1

Line #: NA

Original Specific Comment #: 1

Comment: The three bullets in this section are intended to state the objectives of the investigation. However, the first two bullets actually discuss means for achieving the single objective stated in the third bullet, which is limited to drilling the seven proposed borings. The actual investigation objectives are (1) to determine whether it is necessary to prepare a project specific plan for isolating and managing any NEC solvent-contaminated material in the Burn Pit area and (2) to determine the extent of any such contamination. The bullets should be revised to clearly state these objectives, and the means should be relegated to other sections.

Response: Agreed.

Action: The text in Section 1.1 will be revised to read:

The following objectives will drive the work performed under this PSP:

- to determine the presence, level, and areal extent of any NEC solvent-contaminated material in the Burn Pit area.
- to determine whether measures are necessary for isolating and managing any identified NEC solvent-contaminated material.