



Department of Energy
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JUL 24 2002

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

DOE-0605-02

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 RESPONSES TO COMMENT RESPONSES AND THE REVISED PROJECT SPECIFIC PLAN FOR DELINEATING KNOWN EXCEEDANCES OF THE ON-SITE DISPOSAL FACILITY WASTE ACCEPTANCE CRITERIA IN AREAS 3B/4B/5

- References:
1. Letter, J. Saric to J. Reising, "Area 3B/4B/5 WAC Exceedance RTC," dated June 4, 2002
 2. Letter, T. Schneider to J. Reising, "Disapproval - RTC on the PSP for Delineating Known Exceedances of the OSDF Waste Acceptance Criteria in Areas 3B/4B/5," dated June 10, 2002

Enclosed for your approval are responses to the Ohio Environmental Protection Agency (OEPA) comment responses and the revised Project Specific Plan (PSP) for Delineating Known Exceedances of the On-Site Disposal Facility Waste Acceptance Criteria in Areas 3B/4B/5. Approval was received by the United States Environmental Protection Agency (USEPA) as noted in Reference 1. This PSP has been revised based on the enclosed responses to the OEPA comment responses as noted in Reference 2 as well as Variance/Field Change Notices 20810-PSP-0004-01 and -02.

JUL 24 2002

Mr. James A. Saric
Mr. Tom Schneider

-2-

DOE-0605-02

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

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

Enclosure: As Stated

cc w/enclosure:

T. Schneider, OEPA-Dayton (three copies of enclosure)
M. C. Wojciechowski, Tetra Tech
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

R. Greenberg, EM-31/CLOV
R. J. Janke, OH/FEMP
A. Tanner, OH/FEMP
J. D. Chiou, Fluor Fernald, Inc./MS64
T. Hagen, Fluor Fernald, Inc./MS9
E. Kroger, Fluor Fernald, Inc./MS64
A. Madani, Fluor Fernald, Inc./MS64
F. Miller, Fluor Fernald, Inc./MS64
ECDC, Fluor Fernald, Inc./MS52-7

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENT
RESPONSES ON THE DRAFT PROJECT SPECIFIC PLAN FOR DELINEATING
KNOWN EXCEEDANCES OF THE ON-SITE DISPOSAL FACILITY
WASTE ACCEPTANCE CRITERIA IN AREAS 3B/4B/5
(20810-PSP-0004, REVISION A)

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

Commenting Organization: Ohio EPA
Section #: Pg. #: Line #: Commentator: OFFO
Code: C

Original Comment #: 1

Comment: The response to comment indicates that three PSPs will be submitted to obtain all characterization data for 3B/4B/5. These PSPs are to support the IRDP for this area, which has a milestone submittal of September 2002. When will the third PSP (for FRL) attainment be submitted?

Response: The three characterization PSPs for Areas 3B/4B/5 investigate: 1) the potentially characteristic area west of the Pilot Plant; 2) the exceedances of the OSDF waste acceptance criteria (WAC); and 3) remaining final remediation level (FRL) attainment. The PSP for FRL attainment was submitted to EPA and OEPA on June 20, 2002. In addition, the WAC attainment PSP will also focus on total uranium FRL attainment, as all minimum detectable concentrations are identified at 10 percent of the FRL.

Action: No action required.

Commenting Organization: Ohio EPA
Section #: Pg. #: Line #: Commentator: OFFO
Code: C

Original Comment #: 2

Comment: The response to Ohio EPA's comment reinforces our position that inadequate Tc-99 characterization is planned. However, DOE goes on to state that they will not complete adequate Tc-99 characterization due to the impending September 2002 deadline for the IRDP. Ohio EPA finds this to be a completely unacceptable approach to characterization of the area. Submittal of an IRDP that DOE knew months in advance would be inadequate is not acceptable. This PSP must be revised to adequately delineate Tc-99 contamination and implemented prior to the submittal of the IRDP.

Response: Agree. Additional technetium-99 sampling will be performed under this PSP, with data received and interpreted in time for submittal of the IRDP for Areas 3B/4B/5.

All samples previously specified for collection under this PSP will now be analyzed for technetium-99. Additionally, all available technetium-99 data in Areas 3B/4B/5 were plotted to further evaluate any potential technetium-99 data gaps. Based on historical production information, the additional areas in Areas 3B/4B/5 where technetium-99 may be present but has not yet been sampled for, are in the vicinity of the sanitary sewer line. Technetium-99 is suspected there due to the known presence of technetium-99 at the old sewage treatment plant. This area has only recently become accessible to soil borings because most of the sanitary sewer lines are now isolated. Finally, technetium-99 will also be analyzed in samples to be collected through Variances/Field Change Notices at the north end of the Plant 1 Pad and in the vicinity of Plants 2 and 8.

Action: Revise PSP as stated in the response and re-submit the PSP to OEPA.