



State of Ohio Environmental Protection Agency  
Southwest District

4902

401 East Fifth Street  
Dayton, Ohio 45402-2911

TELE: (937) 285-6357  
FAX: (937) 285-6249

June 4 , 2003

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

**RE: IMPLEMENTATION PLAN FOR AREA 3B/4B/5**

Dear Mr. Reising:

Ohio EPA has reviewed the Implementation Plan for Area 3B/4B/5, 20810-PL-0004 Rev B, DRAFT submitted by DOE on March 31, 2003. Ohio EPA's comments are enclosed.

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

Sincerely,

*Michelle Waller*  
*for*

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

cc: Jim Saric U.S. EPA  
Terry Hagen, Fluor Daniel Fernald  
Michelle Cullerton, Tetra Tech EM Inc.  
Ruth Vandegrift, ODH  
Mark Schupe, HSI Geotrans

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## IMPLEMENTATION PLAN FOR AREA 3A/4B/5

### Comments:

1. Commenting Organization: OEPA      Commentor: OFFO  
 Section #: 1.4.2      Pg. #: 1-6      Line #: 31-36 Code: C  
 Original Comment #: 7  
 Comment: As was stated in the original comment, impacted material in the southern portion of Area 4B should be included in this Implementation Plan. The RTC indicates that it will be, yet the document does not reflect this. Please make the revisions indicated in DOEs RTC on March 31, 2003.
  
2. Commenting Organization: OEPA      Commentor: OFFO  
 Section #: 2.2      Pg. #: 2-4      Line #: 4      Code: C  
 Original Comment #:  
 Comment: This section states Area 5 is approximately 48 acres, while in section 1.2.3 page 12, line 24 states Area 5 is 32 acres. Please clarify.
  
3. Commenting Organization: OEPA      Commentor: OFFO  
 Section #: 2.3.2      Pg. #:      Line #: 5 - 12 Code: C  
 Original Comment #:  
 Comment: This section states that 16 separate locations showed OSDF WAC within Areas 3B/4B5, yet 18 locations are shown on Figure 2-10, labeled 3/B4B/5 WAC Exceedances. Please clarify.
  
4. Commenting Organization: OEPA      Commentor: OFFO  
 Section #: 2.3.2      Pg. #: 2-12, 2-13      Line #:      Code: C  
 Original Comment #:  
 Comment: Numerous places on these two pages refer to Figure 2-9, when it would appear that they should actually be referencing Figure 2-8. Please correct.
  
5. Commenting Organization: OEPA      Commentor: OFFO  
 Section #: 2.6.3      Pg. #: 2-28      Line #: 14 - 18      Code: C  
 Original Comment #:  
 Comment: This bullet references a sampling location (A5A-49) which exceeds the FRL for Arsenic at the 3 to 3.5-foot interval. It goes on to say that it is 'consistent with background concentrations as identified in the Addendum to the CERCLA/RCRA Background Soil Study (DOE 2001e), and therefore will not be excavated'. Ohio EPA takes issue with this on several points.

1. The sample location does indeed exceed the Final Remediation Limits, and therefore must be excavated, as agreed to in the ROD.

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2. The Addendum to the CERCLA/RCRA Background Study, DOE 2001, does not apply to any locations in 3B/4B/5. As quoted directly from the study, 'it was necessary to develop a supplemental background sampling plan to investigate soil concentrations including the 12 to 36 inch depth interval in areas *not affected by the FEMP that have been used for agricultural purposes, specifically crop production*. The supplemental study results allowed for the complete background condition to be assessed and will be used to support remediation and certification decisions in similar *agricultural areas surrounding the FEMP as necessary*'.

3. Lastly, the concentration at location A5A-49, depth 3 - 3.5 feet, as reported in the IP was 17.7 mg/kg. The highest concentration of arsenic in the Background Study at the closest comparable interval (3 feet), was 11.9 mg/kg, still below the onsite FRL. Therefore even though it is not acceptable to even compare the results for purposes of remediation onsite, the level is not 'consistent with background concentrations' as stated in the IP.

6. Commenting Organization: OEPA      Commentor: OFFO  
Section #: 3.5.3      Pg. #: 3-18      Line #: 12-17      Code: C  
Original Comment #:  
Comment: DOE states in 3B/4B/5 that their plan is to leave the West Water Tower's pilings in place, truncated at 569 ft., and capped with a two foot clay plug. A discussion should be added detailing the reason the piling is remaining and specifically why it is more protective of the GMA to allow it to remain than it is to remove it.
7. Commenting Organization: OEPA      Commentor: OFFO  
Section #: 3.9      Pg. #: 3-30      Line #:      Code: C  
Original Comment #:  
Comment: This document should include detail on post-remediation grading and topography as well as interim restoration activities. It is unacceptable to leave these areas unstablized until such time as final restoration plans are developed. This issue has been revisited in the past and acceptable criteria have been established. Please refer to Section 3.6 in DOE's 3A/4A Implementation Plan 20800-PL-0002 Rev 0 Final dated May 2001.