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Department of Energy

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JUL 14 2003

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

DOE-0432-03

Dear Mr. Schneider:

TRANSMITTAL OF RESPONSES TO THE ADDITIONAL OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE REVISED INTEGRATED REMEDIAL DESIGN PACKAGE FOR AREA 3B/4B/5

- References:
1. Letter DOE-0308-03 from J. Reising to J. Saric and T. Schneider, "Transmittal of Responses to Comments and the Revised Integrated Remedial Design Package for Areas 3B, 4B, and 5," dated March 31, 2003
 2. Letter from J. Saric to J. Reising, "Area 3B/4B/5 IRDP," dated May 1, 2003
 3. Letter from T. Schneider to J. Reising, "Implementation Plan for Area 3B/4B/5," dated June 4, 2003

In accordance with the Sitewide Excavation Plan, enclosed for your approval are responses to the additional Ohio Environmental Protection Agency (OEPA) comments on the revised Integrated Remedial Design Package (IRDP) for Area 3B/4B/5, Revision B. Approval from the United States Environmental Protection Agency (USEPA) was received as noted in Reference 2. Upon approval of comment responses, the IRDP will be finalized and transmitted.

If you have any questions or need further information, please contact Johnny Reising at (513) 648-3139.

Sincerely,

Glenn Griffiths
Acting Director

FCP:Reising

Enclosure: As Stated

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JUL 14 2003

Mr. Tom Schneider

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DOE-0432-03

cc w/enclosure:

- R. Janke, OH/FCP
- D. Pfister, OH/FCP
- T. Schneider, OEPA-Dayton (three copies of enclosures)
- J. Saric, USEPA-V, SR-6J
- G. Jablonowski, USEPA-V, SR-6J
- M. Cullerton, Tetra Tech
- F. Bell, ATSDR
- M. Shupe, HSI GeoTrans
- R. Vandegrift, ODH
- AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

- R. Greenberg, EM-31/CLOV
- N. Hallein, EM-31/CLOV
- J. Reising, OH/FCP
- D. Carr, Fluor Fernald, Inc./MS1
- R. Abitz, Fluor Fernald, Inc./MS64
- B. Brucken, Fluor Fernald, Inc./MS41
- J. Chiou, Fluor Fernald, Inc./MS64
- T. Hagen, Fluor Fernald, Inc./MS1
- K. Harbin, Fluor Fernald, Inc./MS60
- U. Kumthekar, Fluor Fernald, Inc./MS64
- F. Miller, Fluor Fernald, Inc./MS64
- D. Powell, Fluor Fernald, Inc./MS64
- D. Russell, Fluor Fernald, Inc./MS64
- A. Snider, Fluor Fernald, Inc./MS64
- T. Poff, Fluor Fernald, Inc./MS65-2
- W. Zebick, Fluor Fernald, Inc./MS60
- ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE DRAFT AREA 3B/4B/5 INTEGRATED REMEDIAL DESIGN PACKAGE
(20810-IRDP, 20810-PL-0004, REVISION B)**

FERNALD CLOSURE PROJECT

IMPLEMENTATION PLAN

Commenting Organization: Ohio EPA
Section #: 1.4.2 Pg. #: 1-6 Lines #: 31-36 Commentator: OFFO
Original Comment #: 1 Code: C

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 DOE's RTC on March 31, 2003.

Response: Agreed.

Action: The last paragraph (bullet item) of Section 1.4.2 will be deleted from the text.

Commenting Organization: Ohio EPA
Section #: 2.2 Pg. #: 2-4 Line #: 4 Commentator: OFFO
Original Comment #: 2 Code: C

Comment: This section states Area 5 is approximately 48 acres, while in Section 1.2.3, Page 1-2, Line 24 states Area 5 is 32 acres. Please clarify.

Response: Area 5 has been redefined several times since the first issuance of the draft IRDP. The current acreage of Area 5 is 28.9 acres.

Action: Section 2.2 and Section 1.2.3 will be revised to incorporate the revised acreage.

Commenting Organization: Ohio EPA
Section #: 2.3.2 Pg. #: Lines #: 5-12 Commentator: OFFO
Original Comment #: 3 Code: C

Comment: This section states that 16 separate locations showed OSDF WAC within Areas 3B/4B/5, yet 18 locations are shown on Figure 2-10, labeled Area 3B/4B/5 WAC Exceedances. Please clarify.

Response: The correct number of above-waste acceptance criteria (WAC) locations within Areas 3B/4B/5 is 16. Two other areas were identified as potential above-WAC areas under the Health and Safety Building, but both of these locations were excavated after the Remedial Investigation/Feasibility Study borings identified high concentrations of total uranium as described later in Section 2.3.2 under Health and Safety Building. There are two planned confirmation borings (one for each area) near the Health and Safety Building that cannot be collected until the utilities have been isolated near the Health and Safety Building. These borings will be collected prior to excavation at these locations.

Action: Figure 2-10 will be revised to include only the 16 confirmed above-WAC locations.

Commenting Organization: Ohio EPA
 Section #: 2.3.2 Pgs. #: 2-12, 2-13 Line #: Commentator: OFFO
 Code: C
 Original Comment #: 4

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.

Response: DOE agrees with the comment.

Action: References to Figure 2-9 on Pages 2-11 through 2-16 have been changed to Figure 2-8.

Commenting Organization: Ohio EPA
 Section #: 2.6.3 Pg. #: 2-28 Lines #: 14-18 Commentator: OFFO
 Code: C
 Original Comment #: 5

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 (FRLs), and therefore must be excavated, as agreed to in the ROD.
2. The Addendum to the CERCLA/RCRA Background Study, DOE 2001, does not apply to any locations in Area 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 to 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 on-site FRL. Therefore even though it is not acceptable to even compare the results for purposes of remediation on site, the level is 'consistent with background concentrations' as stated in the IP.

Response: DOE agrees with the comment.

Action: Section 2.6.3 will be revised by removing the second bullet that addresses A5A-49. The excavation design will be modified to capture this above-FRL condition. Figure 2-35 will be updated with the new excavation elevations.

Commenting Organization: Ohio EPA
 Section #: 3.5.3 Pg. #: 3-18 Lines #: 12-17 Commentator: OFFO
 Code: C
 Original Comment #: 6

Comment: DOE states in Area 3B/4B/5 that their plan is to leave the West Water Tower's pilings in place, truncated at 569 feet, and capped with a 2-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.

Response: Agreed. The decision to truncate the tower pilings is considered prudent primarily because excavation beyond elevation 569 would be exclusively for removal of the pilings rather than contamination, and disturbance of the pilings, even at their upper limit, may create a pathway for contamination to enter the GMA. In addition, removal of the pilings would require extensive excavation beyond the current design grade, requiring removal and potential contamination of massive amounts of soil to ensure safe slopes, or the deployment of specialized excavation techniques.

Action: Section 3.5.3 of the IRDP will be revised to discuss the reasoning behind the decision to truncate the tower pilings.

Commenting Organization: Ohio EPA

Commentator: OFFO

Section #: 3.9

Pg. #: 3-30

Line #:

Code: C

Original Comment #: 7

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 unstabilized 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 Area 3A/4A Implementation Plan, 20800-PL-0002, Rev. 0 Final dated May 2001.

Response: Specification Section 02206, item 3.5, requires interim grading activities after the design grade as been achieved, including maintenance of slopes and ditches and temporary seeding in accordance with OSDF specification Section 02930. These specifications reflect acceptable criteria based on past agreements with the agencies.

Much of the excavation within Areas 3B, 4B and MDC are driven by the removal of contaminated soil. As a result, preparation of final grading drawings for these areas would be conceptual at best due to the potential for supplemental excavation, and should be based on actual post-remediation surveys. A final grading plan has been prepared for Area 5, since most of the excavated soil from Area 5 meets FRLs and will not be disposed. However, these soils will be disturbed during excavation of below-grade structures, and will require a final grading plan. Although the final topography of disturbed soils in Area 5 is unknown, actual quantities of soil can be reasonably estimated to allow for the preparation of a meaningful final grading plan.

Action: Section 3.9 of the Implementation Plan will be revised to reference the applicable specification requirements. In addition, final grading plans for Areas 3B, 4B, and MDC will be prepared once post-remediation surveys have been obtained.