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State of Ohio Environmental Protection Agency

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Maureen O'Connor, Lt. Governor
Christopher Jones, Director

July 25, 2003

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

RE: POST-EXCAVATION AS-BUILT REPORT FOR AREA 7, PHASE I

Dear Mr. Reising:

Ohio EPA has reviewed DOE's May 2003 submittal on the "Post-Excavation As-Built Report for Area 7, Phase I (20501-RP-0001) Rev A DRAFT." Ohio EPA's comments are enclosed.

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

Sincerely,

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

cc: Jim Saric U.S. EPA
Mark Shupe, HSI Geo Trans
Terry Hagen, Fluor Daniel Fernald
Michelle Cullerton, Tetra Tech

**Post-Excavation As-Built Report
For Area 7, Phase I**

Comments:

1. Commenting Organization: OEPA Commentor: OFFO

Section #: General Line #: Pg #: Code: C

Comment: When Ohio EPA requested that DOE provide us with an As-Built Report we anticipated a document that outlined all activities that took place during Phase I, and a document that could be used as a reference for Phase II and III. In saying that, Ohio EPA agrees with US EPA's first comment to DOE. It would seem appropriate to have a "chronology of events" that occurred in Area 7 including a summary of all sampling results and references to other reports that contain information on Area 7.

2. Commenting Organization: OEPA Commentor: OFFO

Section #: Figure 1-1 Line #: Pg #: Code: C

Comment: Figure 1-1 should have the precise areas marked within the excavation boundaries and any other specifics discussed in the document so the figure would provide a better perspective of Area 7.

3. Commenting Organization: OEPA Commentor: OFFO

Section #: 2.3 Line #: 18-19 Pg #: 2-4 Code: C

Comment: Why was the waste water pumped out of the K65 trench and discharged onto SP-7 and not into the Bio Surge Lagoon? This is an entirely inappropriate activity and should not occur again. Collected storm water should be sent to the AWWT via the SWRB or the Bio Surge Lagoon.

4. Commenting Organization: OEPA Commentor: OFFO

Section #: 2.5 Line #: 2-6 Pg #: 2-7 Code: C

Comment: This paragraph states that southern end of the excavation was "relocated approximately 200 feet north" due to overhead power and electric poles being in the excavation area. How was the original southern boundary remediated, and was any contamination found?

5. Commenting Organization: OEPA Commentor: OFFO

Section #: 2.6 Line #: 19-23 Pg #: 2-7 Code: C

Comment: How far north was the southern end of the excavation relocated? Please explain how this changed the initial excavation plan? Was the "southern limit" scanned for possible contamination, along with the rest of the excavation area?

6. Commenting Organization: OEPA Commentor: OFFO

Section #: 3.2.1 Line #: 10-15 Pg #: 3-2 Code: C

Comment: DOE continues to backfill at risk before receiving sample confirmation with the commitment to reexcavate, if above FRL results come back. Why was the above FRL soil sample location, A7-K12, not excavated to attain FRLs? Ohio EPA expects to have these areas remediated and follow up documentation in place. When will this above FRL area and other locations in Area 7, mentioned in this document, be remediated and which phase will this occur?

7. Commenting Organization: OEPA Commentor: OFFO

Section #: Figure 4-3 & 4-4 Line #: Code: C

Comment: The areas described in the text should be marked on both Figures 4-3 and 4-4 for clarity and future reference.