



Department of Energy  
Ohio Field Office  
Fernald Environmental Management Project  
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AUG 14 2003

Mr. James A. Saric, Remedial Project Manager  
United States Environmental Protection Agency  
Region V-SR-6J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0468-03

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

Dear Mr. Saric and Mr. Schneider:

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

In accordance with the Sitewide Excavation Plan, enclosed for your approval is the Page Change to Responses to the additional Ohio Environmental Protection Agency (OEPA) comments on the Revised Integrated Remedial Design Package for Area 3B/4B/5.

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

AUG 14 2003

Mr. James A. Saric  
Mr. Tom Schneider

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cc w/enclosure:

D. Pfister, OH/FCP  
J. Reising, OH/FCP  
J. Sattler, OH/FCP  
T. Schneider, OEPA-Dayton (three copies of enclosure)  
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  
D. Carr, Fluor Fernald, Inc./MS1  
R. Abitz, Fluor Fernald, Inc./MS64  
J. Chiou, Fluor Fernald, Inc./MS64  
T. Hagen, Fluor Fernald, Inc./MS1  
K. Harbin, Fluor Fernald, Inc./MS60  
U. Kumthekar, Fluor Fernald, Inc./MS64  
D. Powell, 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

Response: Agreed. The decision to remove or leave the tower pilings will be deferred until the pilings have been exposed and an evaluation on the pilings has been performed to determine the environment impacts of both options based on conditions of the pilings and surrounding soil.

Action: Section 3.5.3 of the IRDP will be revised to discuss the reasons for potentially leaving the tower pilings in place. After exposing the tower pilings at design grade, an evaluation will be performed on the pilings to determine the environment impacts of both options. The decision to leave or remove the pilings will be made based on this evaluation, as concurred by both the USEPA and OEPA.

PCN 1

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.