



Department of Energy
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SEP 03 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-0499-03

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

Dear Mr. Saric and Mr. Schneider:

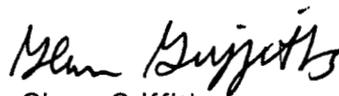
**TRANSMITTAL OF RESPONSES TO COMMENTS AND THE REVISED PROJECT SPECIFIC
PLAN FOR PREDESIGN SAMPLING IN AREA 6 SP-7/OPERABLE UNIT 1 STOCKPILE AREA**

- References:
1. Letter from T. Schneider to J. Reising, "Approval - Project Specific Plan For Predesign Sampling in Area 6 SP-7/OU1 Stockpile Area," dated July 21, 2003
 2. Letter from J. Saric to J. Reising, "A6 SP-7/OU1 Stockpile Predesign PSP," dated July 24, 2003

Enclosed for your approval are responses to the United States Environmental Protection Agency (USEPA) comments and the revised Project Specific Plan for Predesign Sampling in Area 6 SP-7/OU1 Stockpile Area. This document was revised to incorporate comment Responses as noted in Reference 2 and two variances. Approval was received from the Ohio Environmental Protection Agency (OEPA) and is noted in Reference 1.

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

Mr. James A. Saric
Mr. Tom Schneider

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DOE-0499-03

cc w/enclosure:

T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SR-6J
F. Bell, ATSDR
M. Cullerton, Tetra Tech
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
K. Johnson, OH/FCP
J. Reising, OH/FCP
R. Abitz, Fluor Fernald, Inc./MS64
J. D. Chiou, Fluor Fernald, Inc./MS64
M. Frank, Fluor Fernald, Inc./MS64
T. Hagen, Fluor Fernald, Inc./MS1
F. Miller, Fluor Fernald, Inc./MS64
T. Poff, Fluor Fernald, Inc./MS65-2
D. Powell, Fluor Fernald, Inc./MS64
R. White, Fluor Fernald, Inc./MS52-5
ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT PROJECT SPECIFIC PLAN FOR PREDESIGN SAMPLING
IN AREA 6 SP-7/OU1 STOCKPILE AREA
(20650-PSP-0001, REVISION A)**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

AUGUST 2003

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
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(20650-PSP-0001, REVISION A)**

FERNALD CLOSURE PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 2.2

Page #: 2-2

Line #: 4

Original Specific Comment #: 1

Comment: The text states that real-time surface measurements will not be made in the stockpile area until all operations have been completed. It is unclear what operations are being referred to, and the timeframe when they will be completed is not identified. The text should be revised to describe the operations and to include a proposed schedule for (1) completion of operations in the stockpile area, (2) predesign soil sampling activities, and (3) real-time surface measurements.

Response: Agree.

Action: The text will be revised as follows:

“Shearing operations of oversized material for OSDF placement are currently being conducted in the area and are to be completed by the first week of September 2003. Although predesign samples can be collected in this area, real-time surface measurements will not be collected until after the shearing operations are completed (e.g., early September 2003).”

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 2.4.1

Page #: 2-3

Line #: 3

Original Specific Comment #: 2

Comment: The text refers to borings with above-waste acceptance criteria (WAC) results. The text should be revised to cite Appendix B, which contains WAC.

Response: Agree.

Action: The text will be revised as follows:

“The above-WAC historical sampling locations are shown in Figure 2-2. Of the eight boring locations with above-WAC results, three locations are outside the Above-WAC Stockpile Area. Two of these three locations had above-WAC results for total uranium (1628.21 mg/kg at 0.0 to 0.17 feet in boring CIS_SYSGEN_508 and 2090.3 mg/kg at 0.0 to 0.5 feet in boring CIS_SYSGEN_716). Both of these above-WAC results are bounded at depth (0.5 to 1.0 foot) by the historical data. These locations will be laterally bounded with real-time measurements after current operations in the area are completed in early September 2003. The third above-WAC sample result outside the Above-WAC Stockpile Area was for technetium-99 (93 pCi/g in boring CIS_SYSGEN_702 at 0.0 to 0.2 feet). This

above-WAC result will be bounded with five new borings: one each to the north, south, east, and west at depths of 0 to 0.5 foot and one boring at the same location sampled at 0 to 0.5 foot and at 0.5 to 1 foot (borings A6-OU1-05 through -09 on Figures 2-4 and 2-5). The remaining five above-WAC sample locations (new borings A6-SP7-01 through 09 are all within the Above-WAC Stockpile Area and are associated with soil piles (SP-5 and SP-7) that have already been removed. New sample locations in these areas will be collected after operations are complete and after removal of the artificial lining and will be completed to depths of 5 to 5.5 feet.

WAC values for technetium-99 and total uranium are given in the Target Analyte Lists in Appendix B.”

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 2.4.2

Page #: 2-3

Line #: 22

Original Specific Comment #: 3

Comment: The text refers to historical sampling locations with analytical results that exceeded final remediation levels (FRLs). The text should be revised to cite Appendix B, which contains FRLs.

Response: Agree.

Action: The text will be revised as follows:

“The above-FRL historical sampling locations are shown in Figure 2-3 and FRL values are given in the Target Analyte Lists in Appendix B.”

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 2.5.1

Page #: 2-4

Line #: 30

Original Specific Comment #: 4

Comment: The text states that Appendix B presents all boring identifications, locations, target analyte lists, and depths. This information is actually provided in Appendix C. The text should be revised accordingly.

Response: Agree.

Action: The text will be revised as follows:

“Appendix C shows all boring IDs, locations, Target Analyte Lists and depths.”

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 3.0

Page #: 3-1

Line #: 14

Original Specific Comment #: 5

Comment: The text states that real-time surface measurements will not be made in the stockpile area until all operations have been completed. It is unclear what operations are being referred to, and the timeframe when they will be completed is not identified. As stated in Specific Comment 1, the text should be revised to describe the operations and to include a proposed schedule for (1) completion of operations in the stockpile area, (2) predesign soil sampling activities, and (3) real-time surface measurements.

Response: Agree.

Action: The text will be revised as follows:

“Shearing operations of oversized material for OSDF placement are currently being conducted in the area and are to be completed by the first week of September 2003. Although predesign samples can be collected in this area, real-time surface measurements will not be collected until after the shearing operations are completed (e.g., early September 2003).

Real-time data for excavation control and precertification will be covered under another PSP.”