



State of Ohio Environmental Protection Agency

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October 27, 2003

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

RE: DISAPPROVAL - IP FOR AREA 6 OU1 STOCKPILE AREA

Dear Mr. Griffiths:

Ohio EPA has reviewed DOE's submittal, "Implementation Plan for Area 6 OU1 Stockpile Area" received on September 17, 2003. Ohio EPA disapproves this document. Attached are Ohio EPA's comments.

Although the document is not approved, Ohio EPA does agree that excavation may begin on the portion of the OU1 Stockpile Area which lays south of the Waste Pit 4 Cap material.

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

Sincerely,

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 6
OU1 STOCKPILE AREA**

COMMENTS:

1. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Line #: Code: C
Original Comment #:
Comment: This document does not provide line numbers. In future submittals, please provide the numbers to help facilitate the review and comment process.

2. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:
Comment: None of the maps provided show the current configuration of the area, such as the Waste Pit 4 Cap material and debris located north of it. Please include a current map.

3. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.4.3, 3.7 Pg. #: 1-6, 3-4 Line #: Code: C
Original Comment #:
Comment: These sections discuss interim grading as part of the remedial action, inferring grading will occur before certification. As stated in the SEP, Section 2.5.13, rough or interim grading is to be preformed *after* certification.

4. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.2 Pg. #: 2-2 Line #: Code: C
Original Comment #:
Comment: This section refers to the OU1 Stockpile Area as 6 acres, while the Executive Summary states 4.3 acres, and section 1.2 states 5 acres. Please clarify.

5. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.2 Pg. #: 2-2 Line #: Code: C
Original Comment #:
Comment: This section states the 'OU1 Stockpile Area is a flat, irregularly shaped....The northern part of the area is the former site of SP-7 and includes the current lined, above-WAC stockpile area'. This paragraph implies that SP-7 is part of the area addressed in this document for remedial activities. Other areas of the document exclude SP-7. Please clarify when SP-7 will be addressed, and in what document.

6. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.8 Pg. #: 3-4, 3-5 Line #: Code: C
Original Comment #:
Comment: This plan does not specify how the soil underneath the Waste Pit 4 cap material will be handled once the cap material is removed. Please provide details for scanning and sampling the area after removal of the cap.
7. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.9 Pg. #: 3-5 Line #: Code: C
Original Comment #:
Comment: This section references the PSP for General Characterization for Sitewide Soil Remediation for precertification. This document has not been approved.
8. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.9 Pg. #: 3-5 Line #: Code: C
Original Comment #:
Comment: The last paragraph states 'After precertification activities are completed, certification samples will be collected in preparation of the Area 6 CDL'. A Certification Design Letter lays out the plan for taking certification samples for an area, and is completed and approved *before* the CDL. Please correct.