



State of Ohio Environmental Protection Agency

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November 6, 2003

Mr. Glenn Griffiths
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Re: DISAPPROVAL-TRANSMITTAL OF THE RESPONSES TO THE OEPA COMMENTS ON THE DRAFT PROJECT SPECIFIC PLAN FOR AREA 6 SOLID WASTE LANDFILL EXCAVATION CHARACTERIZATION

Dear Mr. Griffiths:

Ohio EPA has reviewed DOE's Transmittal of the Responses to the Agency's Comments submitted on November 5, 2003, on the Draft Project Specific Plan for Area 6 Solid Waste Landfill Excavation Characterization (20600-PSP-0005, Rev A Draft). Ohio EPA finds the responses inadequate and provides the following to DOE's response on Original Comment #3.

The proposed strategy is unacceptable and appears significantly flawed. If contamination remains in the berms of the excavation, certification will certainly be unacceptable. The approach is inconsistent with any other excavation on the site. Characterization of the side slopes is absolutely within the scope of the project. Lateral excavation of the material can be evaluated subsequent to the completion of data collection. The existence of the administrative boundary provides no relief from the basic necessity of characterizing the excavation. Additionally it is unlikely that the excavation, when safe slopes are included encompasses the entirety of the administrative boundary to its vertical extent if the side slopes are uncharacterized. Finally the response proposes additional characterization in a document that has not been referenced elsewhere and provides no date for submittal of such a document.

If you have 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
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans

Michelle Cullerton, Tetra Tech EM Inc.
Ruth Vandergrift, ODH