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Department of Energy  
Ohio Field Office  
Fernald Environmental Management Project  
P. O. Box 538705  
Cincinnati, Ohio 45253-8705  
(513) 648-3155



OCT 24 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-0026-04

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 REVISION 2 OF THE PROJECT SPECIFIC PLAN FOR REAL-TIME SCAN OF PADDYS RUN CORRIDOR AND ASSOCIATED DRAINAGE FEATURES**

- References:
1. Letter, J. Saric to J. Reising, "Paddys Run Corridor Real Time Scan," dated September 26, 2003
  2. Letter, T. Schneider to J. Reising, "Conditional Approval - PSP for Real-Time Scan of Paddys Run Corridor and Associated Drainage Features," dated October 6, 2003

Enclosed for your approval are responses to the United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA) comments and Revision 2 of the Project Specific Plan (PSP) for Real-Time Scan of Paddys Run Corridor and Associated Drainage Features. This PSP was revised to incorporate comment responses as noted above.

If you have any questions or need further information, please contact Johnny Reising at (513) 648-3139.

Sincerely,

Glenn Griffiths  
Acting Director

FCP:Reising

Enclosures: As Stated

/

Mr. James A. Saric  
Mr. Tom Schneider

cc w/enclosures:

- J. Reising, OH/FCP
- T. Schneider, OEPA-Dayton (three copies of enclosures)
- G. Jablonowski, USEPA-V, SR-6J
- F. Bell, ATSDR
- M. Cullerton, Tetra Tech
- M. Shupe, HSI GeoTrans
- R. Vandegrift, ODH
- AR Coordinator, MS78

cc w/o enclosures:

- R. Greenberg, EM-31/CLOV
- N. Hallein, EM-31/CLOV
- K. Johnson, OH/FCP
- R. Abitz, Fluor Fernald, Inc./MS64
- J. Chiou, Fluor Fernald, Inc./MS64
- K. Flaugh, 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
- ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY'S  
TECHNICAL REVIEW COMMENTS ON THE  
REVISED PROJECT SPECIFIC PLAN FOR REAL-TIME SCAN OF  
PADDYS RUN CORRIDOR AND ASSOCIATED DRAINAGE FEATURES  
(20300-PSP-0008, REVISION 1)**

**FERNALD CLOSURE PROJECT  
FERNALD, OHIO**

**OCTOBER 23, 2003**

**U.S. DEPARTMENT OF ENERGY**

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY'S  
TECHNICAL REVIEW COMMENTS ON THE  
REVISED PROJECT SPECIFIC PLAN FOR REAL-TIME SCAN OF  
PADDYS RUN CORRIDOR AND ASSOCIATED DRAINAGE FEATURES  
(20300-PSP-0008, REVISION 1)**

**FERNALD CLOSURE PROJECT**

**GENERAL COMMENT**

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: Not Applicable (NA)

Page #: NA

Line #: NA

Original General Comment #: 1

**Comment:** The plan does not contain any information about final remediation levels (FRL) for the primary radionuclides of concern at the site (uranium, radium-226, radium-228, thorium-230). At a minimum, a reference to a document containing these FRLs should be included in the text.

**Response:** The primary objective of this PSP is to determine if any radiological contamination patterns or hot spots exist in the stream corridors through the use of real-time instrumentation in areas that are safely accessible. Therefore, the applicable soil and sediment FRLs were only referenced concerning historical soil and sediment data in order to define an exceedance (refer to Section 1.2, Pages 1-3 and 1-4 of Revision 1). The Sitewide Excavation Plan, Revision 0 (DOE 1998) includes the soil and sediment FRLs in Table 1-4.

**Action:** Text will be added to the PSP (Revision 2) to identify that the sediment FRLs are listed in Table 1-4 of the Sitewide Excavation Plan, Revision 0.

**SPECIFIC COMMENT**

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 1.2

Page #: 1-4

Line #: 16 to 19

Original Specific Comment #: 1

**Comment:** The text states that between 1990 and 2002, exceedances were primarily limited to samples collected in 1990 and 1992. However, the specific locations and the respective concentrations of these exceedances are not identified. In addition, as discussed in General Comment #1, the FRLs used to identify the exceedances are not provided in the plan. The plan should be revised to identify the specific locations and concentrations of exceedances detected between 1990 and 2002 and to address General Comment #1.

**Response:** A summary table (Table 1-3) has been added to the PSP to identify the approximate sample location and concentration of each exceedance as compared to the sediment FRLs included in the Sitewide Excavation Plan, Revision 0. Additionally, corrections were made to Table 1-2 by revising some of the upper range values for the lower portion of Paddys Run.

**Action:** As stated in the response.