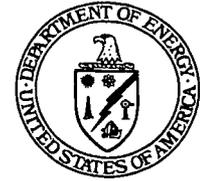


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Department of Energy  
Ohio Field Office  
Fernald Environmental Management Project  
P. O. Box 538705  
Cincinnati, Ohio 45253-8705  
(513) 648-3155



JAN 29 2004

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-0129-04

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 RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY  
COMMENTS ON THE DRAFT PROJECT SPECIFIC PLAN AND THE REVISED PROJECT  
SPECIFIC PLAN FOR AREA 1, PHASE IV EXCAVATION CHARACTERIZATION AND  
PRECERTIFICATION, REVISION 0**

- References:
1. Letter DOE-0017-04, W. Taylor to J. Saric and T. Schneider, "Transmittal of the Draft Project Specific Plan for Area 1, Phase IV Excavation Characterization and Precertification," dated December 4, 2003
  2. Letter, T. Schneider to J. Reising, "Comments – PSP for A1PIV Excavation Characterization and Precertification," dated December 11, 2003
  3. Letter, J. Saric to J. Reising, "A1,P4 Excavation and Precertification Plan," dated December 24, 2003

Enclosed for your review and approval are the Responses to the Ohio Environmental Protection Agency Comments on the draft Project Specific Plan (PSP), as well as a revised Project Specific Plan for Area 1, Phase IV Excavation Characterization and Precertification, Revision 0 (Reference 2). The draft PSP received the United States Environmental Protection Agency (USEPA) approval (Reference 3).

JAN 29 2004

DOE-0129-04

Mr. James A. Saric  
Mr. Tom Schneider

-2-

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

Sincerely,

  
William J. Taylor  
Director

FCP:Reising

Enclosures: As Stated

## cc w/enclosures:

J. Reising, OH/FCP  
T. Schneider, OEPA-Dayton (three copies of enclosures)  
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 enclosures:

D. Arico, Fluor Fernald, Inc./MS64  
J. Chiou, 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 OEPA COMMENTS ON THE  
PROJECT SPECIFIC PLAN FOR  
A1PIV EXCAVATION CHARACTERIZATION AND  
PRECERTIFICATION**

**FERNALD CLOSURE PROJECT  
FERNALD, OHIO**

**JANUARY 2004**

**U.S. DEPARTMENT OF ENERGY**

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RESPONSES TO OEPA COMMENTS ON THE PROJECT SPECIFIC PLAN FOR A1P1V EXCAVATION CHARACTERIZATION AND PRECERTIFICATION

ORIGINAL COMMENTS

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.8.1 Pg.#: 2-5, 2-6 Line #: none provided Code: C
Original Comment #: 1
Comment: This section discussing physical sampling which will occur under this document, is very vague. Please supply more details, such as:

- A. Physical samples will be taken in the location of the two above-ground fuel tanks after the tanks have been removed. The samples will be analyzed for BTEX and TPH to confirm whether any leaks or spills occurred. OEPA concurs that the sample locations, depths, etc., will not be known until after the tanks are removed and can be addressed in a V/FCN. It is unclear why the analytical requirements and QC requirements are not presented in this PSP. Please correct.
B. No details are given as to the size of the area to be sampled/possible number of samples to be taken. Although actual numbers may later be confirmed in a V/FCN, since sampling will occur, details of the area should be included.
C. When referencing procedures not defined in this document, please include full references stating the name of the document, version, etc. so people reviewing the document may reference the material (IE Procedure SMPL-26). Otherwise, please include all procedures in the document text.

Response: A. Analytical requirements will be added to the plan as a table in Section 2.0. QC requirements such as quality control samples and data validation are provided in Section 3.0 of the PSP.
B. Following removal of the above-ground fuel tanks, an area approximately 30' X 40' in size will be sampled to confirm whether any leaks or spills occurred. Text will be added to estimate the number of samples to be collected.
C. The titles of Procedure SMPL-01 and EW-0002 were inadvertently omitted from the text. The titles of both procedures will be incorporated into Section 2.8.1. Revision numbers of procedures have not previously been included in PSPs but Section 3.5, which lists applicable procedures, manuals, and documents, will be revised to state that the most current procedures at the time of sampling will be followed.

Action: A. The target analyte lists (TALs) and the Sampling and Analytical Requirements will be presented in tables and inserted into the PSP as Table 2-3 and Table 2-4, respectively. The reference to "analytical requirements and QC requirements" in the second paragraph of Section 2.8.1, will be deleted from the following sentence: "The samples to be collected, the locations, depths, sample numbers, collection methods, analytical requirements and QC requirements will be based on field conditions."
B. The following sentence will be added to the first paragraph of Section 2.8.1: "The area to be sampled is approximately 30 feet by 40 feet."

Additionally, Section 2.8.1 now contains a paragraph that explains the sampling approach for the collection of physical samples during excavation control, including the minimum number of sample locations required to be collected along the sideslopes and floor of an excavated area.

4

- C. Revise the text in the last paragraph of Section 2.8.1 to include the following procedure titles: "Procedure SMPL-01, Solids Sampling" and "EW-0002, Chain of Custody/Request for Analysis Record for Sample Control" when referenced.

The first sentence of Section 3.5 will be revised to state: "Work performed under this PSP will be conducted in accordance with the most current revisions of the following procedures at the time of sampling."