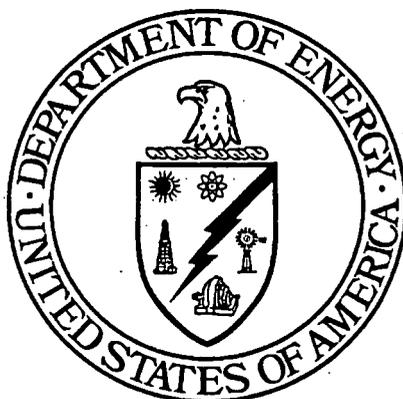


**CERTIFICATION DESIGN LETTER
FOR AREA 9, PHASE III
ABANDONED OUTFALL LINE – PART ONE**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**



JUNE 2004

U.S. DEPARTMENT OF ENERGY

**21140-RP-0002
REVISION A
DRAFT**

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LIST OF ACRONYMS AND ABBREVIATIONS

A1PII	Area 1, Phase II
A9PIII	Area 9, Phase III
ASCOC	area-specific constituent of concern
ASL	analytical support level
BTV	Benchmark Toxicity Value
CDL	Certification Design Letter
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
COC	constituent of concern
CRDL	contract required detection limit
CU	certification unit
DOE	U.S. Department of Energy
FCP	Fernald Closure Project
FMPC	Feed Material Production Center
FRL	final remediation level
IEMP	Integrated Environmental Monitoring Program
IRDP	Integrated Remedial Design Package
MDL	minimum detection level
mg/kg	milligrams per kilogram
OU5	Operable Unit 5
pCi/g	picoCuries per gram
ppb	parts per billion
ppm	parts per million
PSP	Project Specific Plan
RCRA	Resource Conservation and Recovery Act
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
SED	Sitewide Environmental Database
SEP	Sitewide Excavation Plan
SR	State Route
UCL	Upper Confidence Limit
VOC	volatile organic compound

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EXECUTIVE SUMMARY

This Certification Design Letter (CDL) describes the certification approach for a section of Area 9, Phase III – Part One (A9PIII) from the eastern boundary of the Fernald Closure Project (FCP) to State Route (SR) 128. The following information is included in the CDL:

- The boundaries (Figure 1-1) and a description of the area to be certified under the guidance of this CDL;
- A presentation of historical data from the area proposed for certification;
- A discussion of the area-specific constituent of concern (ASCOC) selection process and list of ASCOCs assigned to A9PIII;
- A presentation of the certification unit (CU) boundaries and proposed sampling strategy;
- The analytical requirements and the statistical methodology that will be employed; and
- The proposed schedule for the certification activities.

This CDL only covers the soil beneath the abandoned outfall line bedding material from the eastern boundary of the FCP to SR 128. Although precertification activities have not yet been completed, the U.S. Department of Energy (DOE) anticipates that no further remediation activities are required for this particular area and certification activities may begin. Since this is a trench certification effort, precertification real-time measurements will be completed in conjunction with certification sampling. Real-time scanning results from precertification activities of A9PIII will be presented in the certification report.

The certification design presented in this CDL follows the general approach outlined in Section 3.4 of the Sitewide Excavation Plan (SEP, DOE 1998) and SEP Addendum (DOE 2001a). The selection of A9PIII ASCOCs was accomplished using constituent of concern (COC) lists in the Operable Unit 5 Record of Decision (DOE 1996). A total of three CUs have been established to cover the A9PIII certification area. The CU design was based on the length and width of the trench.

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1.0 INTRODUCTION

This Certification Design Letter (CDL) describes the certification approach for demonstrating that soil in Area 9, Phase III (A9PIII) meets the final remediation levels (FRLs) for all area-specific constituents of concern (ASCOCs). The format of this CDL follows guidelines presented in the Sitewide Excavation Plan (SEP, DOE 1998). Accordingly, this CDL consists of five sections:

- 1.0 Introduction - Presentation of the purpose, objectives, and scope of this CDL
- 2.0 Historical Data - Presentation and discussion of historical soil data from A9PIII
- 3.0 Area-Specific Constituents of Concern - Discussion of selection criteria and ASCOCs for A9PIII
- 4.0 Certification Approach - Presentation of design, sampling and analytical methodologies
- 5.0 Schedule

1.1 OBJECTIVES

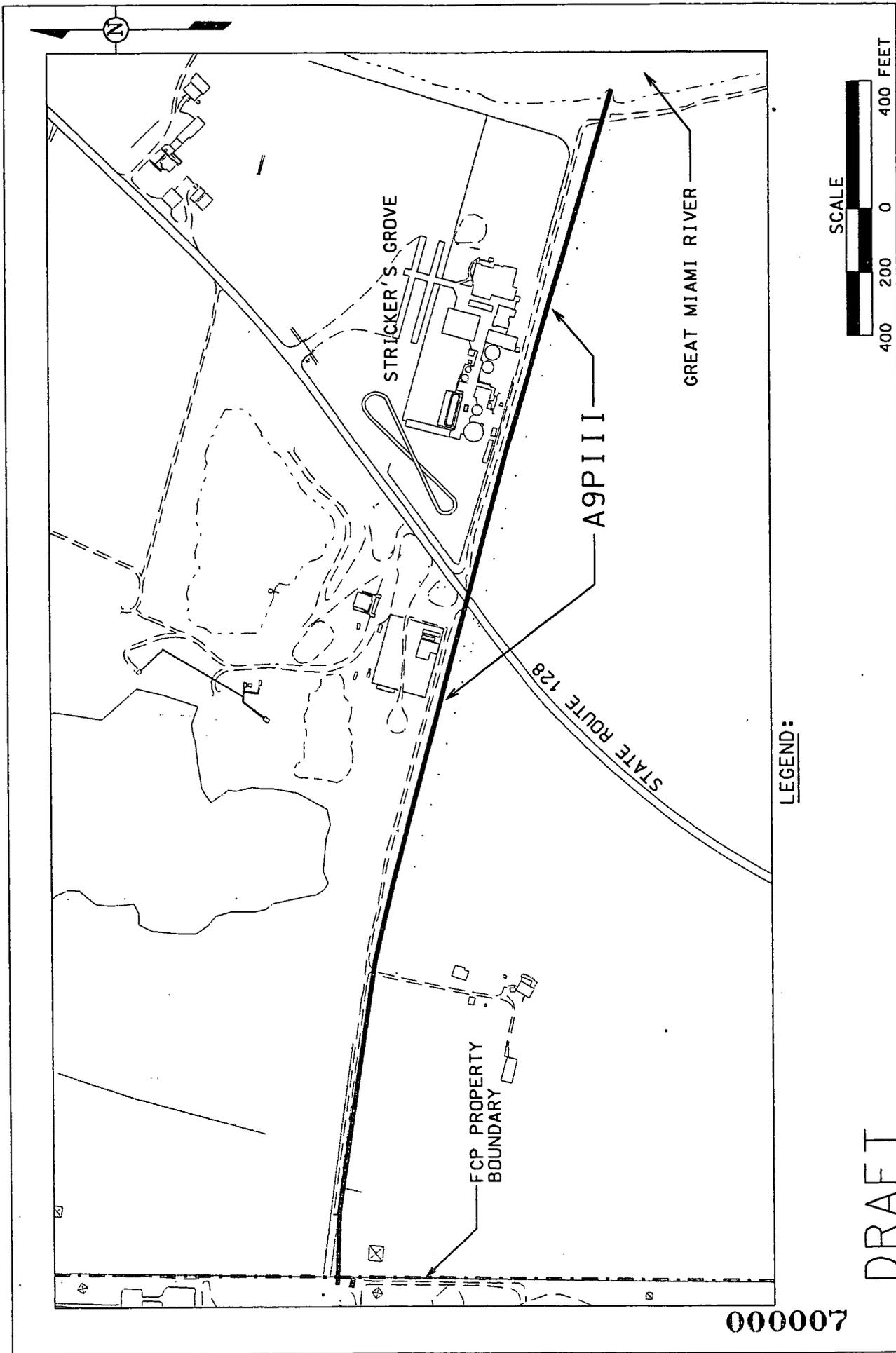
The primary objectives of this document are to:

- Define the boundaries of the area to be certified under the guidance of this CDL;
- Present historical data collected from within the area proposed for certification;
- Define the ASCOC selection process and list the selected A9PIII ASCOCs;
- Present the certification unit (CU) boundaries and proposed certification sampling strategy;
- Summarize the analytical requirements and the statistical methodology that will be employed; and
- Present the proposed schedule for the certification activities.

1.2 SCOPE AND AREA DESCRIPTION

A9PIII is located offsite, stretching east from the eastern boundary of the Fernald Closure Project (FCP) to the Great Miami River. This area only encompasses the soil beneath the abandoned outfall line bedding material. The scope of this CDL only covers the portion of A9PIII that extends from the eastern boundary of the Fernald Closure Project (FCP) to State Route 128. The location of A9PIII is shown on Figure 1-1, and the location of A9PIII – Part One is shown on Figure 1-2.

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FIGURE 1-1. AREA 9 PHASE III LOCATION MAP

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2.0 HISTORICAL AND PRECERTIFICATION DATA

Characterization data have been collected from A9PIII as part of the Offsite Soils Removal Action Around Manhole 180, FMPC Effluent Line. The criteria identified for this removal action was 52 parts per million (ppm) total uranium and/or 46 ppm total thorium. These action levels were established and used prior to the development of the current Final Remediation Levels (FRL). When the historical data collected in 1989 and 1993 were compared to the newly established FRLs, several FRL exceedances were identified. Confirmatory sampling will be conducted to demonstrate whether or not the historical FRL exceedances still exist. The following section further summarizes the data collection chronology.

2.1 HISTORICAL AND PRECERTIFICATION DATA SUMMARY

2.1.1 Historical Physical Sampling Data

Before initiating the certification process, all pertinent historical data relative to A9PIII were examined. This included the August 1988 National Pollutant Discharge Elimination System (NPDES) Permit Application and Offsite Soils Removal Action Around Manhole 180, FMPC Effluent Line. The list of secondary ASCOCs was partially developed from these two sources of information as discussed in Section 3.2.

2.1.2 Precertification Real-Time Scanning

Precertification real-time scanning will occur in conjunction with excavation of the abandoned outfall line. After the overburden material, piping, and bedding material are removed, real-time scanning of the bottom of the excavation will occur. Precertification results will be presented in the certification report for this area.

3.0 AREA-SPECIFIC CONSTITUENTS OF CONCERN

In the Operable Unit 5 (OU5) Record of Decision (ROD, DOE 1996), there are 80 soil COCs with established FRLs. These COCs were retained for further investigation based on a screening process that considered the presence of the constituent in site soil and the potential risk to a receptor exposed to soil containing this contaminant. In spite of the conservative nature of this COC retention process, many of the COCs with established FRLs have a limited distribution in site soil or the presence of the COC is based on high contract required detection limits (CRDLs). When FRLs were established for these COCs in the OU5 ROD, the FRLs were initially screened against site data presented on spatial maps to establish a picture of potential remediation areas.

By reviewing existing RI/FS data presented on spatial distribution maps, the sitewide list of soil COCs in the OU5 ROD was reduced from 80 to 30. This reduction was possible because the majority of the COCs with FRLs listed in the OU5 ROD have no detections above their corresponding FRL, thus eliminating them from further consideration. The 30 remaining sitewide COCs account for over 99 percent of the combined risk to a site receptor model, and they comprise the list from which all of the remediation ASCOCs are drawn. When planning certification for a remediation area, additional selection criteria are used to derive a subset of these 30 COCs. This subset of COCs is passed along to the certification process.

3.1 SELECTION CRITERIA

All of the sitewide primary COCs (total uranium, radium-226, radium-228, thorium-232, and thorium-232) will be retained as ASCOCs for certification in all areas of the site as well as off-property. The selection process for retaining secondary ASCOCs for a remediation area is driven by applying a set of decision criteria. A soil contaminant will be retained as an ASCOC if:

- It was retained as an ASCOC in adjacent FCP soil remediation areas;
- It is listed as a soil COC in the OU5 ROD, and it is listed as an ASCOC in Table 2-7 of the SEP for the Remediation Area of interest (Note: Table 2-7 does not include off-property Area 9);
- Analytical results show that a contaminant is present above its FRL, and the above-FRL concentrations are not attributable to false positives or elevated CRDLs;
- It can be traced to site use, either through process knowledge or known release of the constituent to the environment; and
- Physical characteristics of the contaminant, such as degradation rate and volatility, indicate it is likely to persist in the soil between time of release and remediation.

1 3.2 ASCOC SELECTION PROCESS FOR A9PIII

2 Total uranium, radium-226, radium-228, thorium-228 and thorium-232 are sitewide primary COCs, and
3 will be retained as ASCOCs for the A9PIII CUs. Additionally, cesium-137 and technetium-99 will be
4 retained because of historical FRL exceedances. The remaining suite of ASCOCs to be analyzed during
5 certification of the A9PIII – Part One is based on the list of ASCOCs from the adjacent FCP soil
6 remediation area as well as those constituents identified on the 1988 NPDES Permit Application that either
7 have an FRL or are RCRA characteristic and were detected in the abandoned outfall line. Therefore, the
8 ASCOCs for each of the A9PIII CUs located east of the FCP include the suite of ASCOCs for the adjacent
9 A1PII remediation area. The ASCOCs will be certified to the more stringent off-property soil FRLs
10 identified in the OU5 ROD. The selected A9PIII ASCOCs for the CUs east of A1PII are listed on
11 Tables 3-1, along with their applicable FRLs.

12
13 Table 3-1 lists the ASCOCs that will be retained for sampling based on the above listed criteria. The
14 reason for constituent retention is included in the table.

1
2
3
TABLE 3-1
ASCOC LIST FOR A9PIII – PART ONE CERTIFICATION UNITS EAST OF A1PII

ASCOC	Off-Property FRL	Reason Retained
Total Uranium	50 mg/kg	Retained as a primary ASCOC sitewide
Radium-226	1.5 pCi/g	Retained as a primary ASCOC sitewide
Radium-228	1.4 pCi/g	Retained as a primary ASCOC sitewide
Thorium-228	1.5 pCi/g	Retained as a primary ASCOC sitewide
Thorium-232	1.4 pCi/g	Retained as a primary ASCOC sitewide
Cesium-137	0.82 pCi/g	Above-FRL concentration
Technetium-99	1.0 pCi/g	Above-FRL concentration
Antimony	0.61 mg/kg	ASCOC for A1PII*
Arsenic	9.6 mg/kg	ASCOC for A1PII
Beryllium	0.62 mg/kg	ASCOC for A1PII
Boron	4.0 mg/kg	NPDES Permit Application
Cadmium	0.91 mg/kg	NPDES Permit Application
Chromium	11 mg/kg (0.05 mg/kg)	NPDES Permit Application
Lead	400 mg/kg (200 mg/kg)	ASCOC for A1PII*
Molybdenum	13 mg/kg (10 mg/kg)	ASCOC for A1PII*
Silver	1.0 mg/kg	NPDES Permit Application
1,1-dichloroethene	0.059 mg/kg	NPDES Permit Application
Tetrachloroethene	1.0 mg/kg	ASCOC for A1PII/NPDES Permit Application
Aroclor-1254	0.04 mg/kg	ASCOC for A1PII
Aroclor-1260	0.04 mg/kg	ASCOC for A1PII
Tetrachloroethene	1.0 mg/kg	ASCOC for A1PII

4 * Ecological COC

5 BTV - benchmark toxicity value

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4.0 CERTIFICATION APPROACH

4.1 CERTIFICATION DESIGN

The certification design for A9PIII - Part One follows a similar approach described in the CDL For Area 1, Phase II Sector 3 Utility Trenches (A1PII-S3UT). The trenches described in the CDL for A1PII-S3UT were evaluated to determine the maximum distance between sampling locations. The distance between locations is approximately 54 feet for the longest trench. Since the trench in A9PIII - Part One is significantly longer, a conservative distance of 50 feet between sampling locations was selected as a starting point.

The points were laid out in the trench that overlay the western section of the abandoned outfall line. In order to achieve a whole number of CUs in A9PIII - Part One, the distance between sampling locations had to be reduced to approximately 43 feet, which enabled the placement of three CUs for A9PIII - Part One, the scope of this CDL. This will allow for more concentrated sampling and ensure the excavation activities had no effect on the soil in A9PIII. The CUs are shown on Figures 4-1.

Sample locations were then evenly spaced across the length of the CU with one location falling within each of the 16 sub-CUs. The locations were then tested against the minimum distance criteria for the CU. All sub-CUs and planned A9PIII certification sampling locations are shown on Figures 4-2, 4-3, and 4-4. Every fourth sample location in each CU is designated with a "V," indicating archive sample locations. One sample location in each CU is designated with a "D," indicating a field duplicate sample collection location.

Certification sampling locations will be field located by measuring approximately 43 feet between each location. Each sampling location will be flagged along the edge of the excavation so that it can be surveyed. Locations may be moved if a subsurface obstacle such as a rock or tree root prevent collection. Requirements for moving a certification sample location will be discussed in the PSP for A9PIII Certification Sampling.

All 16 locations in each CU will be collected from the bottom of the excavation from the bucket of an excavator after the piping, bedding material, and roughly six inches of underlying soil have been removed. The goal will be to collect the top six inches of soil from the bottom of the excavation. Twelve samples per CU will be collected for analysis. The four samples designated as "archive" will be collected and stored in the event they are needed for additional analysis.

1 4.2 ANALYTICAL METHODOLOGY

2 Laboratory analysis of certification samples will be conducted using an approved analytical method, as discussed
3 in Appendix H of the SEP. The minimum detection level (MDL) will be set at 10 percent of the FRL but the
4 low off-property FRLs may result in difficulties for laboratories to meet 10 percent of the FRL for some analytes.

5 In those instances, the MDL will be set as low as reasonable below the FRL. Analyses will be conducted to
6 Analytical Support Level (ASL) D or E, where the MDL of the FRL is above the SCQ ASL detection level, but
7 the analyses meet all other SCQ ASL D criteria. An ASL D data package will be provided for all of the
8 analytical data. Because results are batched or grouped by CU, all results from a minimum of one of the three
9 CUs will be validated to validation support level (VSL) D. Samples rejected during the validation process will
10 be re-analyzed, or an archive sample may be substituted if there is insufficient material available from the initial
11 sample. Once data are validated as required, results will be entered into the SED.

12
13 4.3 STATISTICAL ANALYSIS

14 Once data are entered into the SED, a statistical analysis will be performed to evaluate the pass/fail criteria
15 for each CU. The statistical approach is discussed in Section 3.4.3, Appendix G of the SEP, and
16 Section 3.4.8 of the SEP Addendum.

17
18 When all CUs within the scope of this CDL have passed certification, a Certification Report will be issued.
19 The Certification Report will be submitted to the regulatory agencies to receive acknowledgment that the
20 pertinent operable unit remedial actions were completed, and the individual CUs are certified and may be
21 released for interim or final land use. Section 7.4 of the SEP provides additional details and describes the
22 required content of the Certification Report.

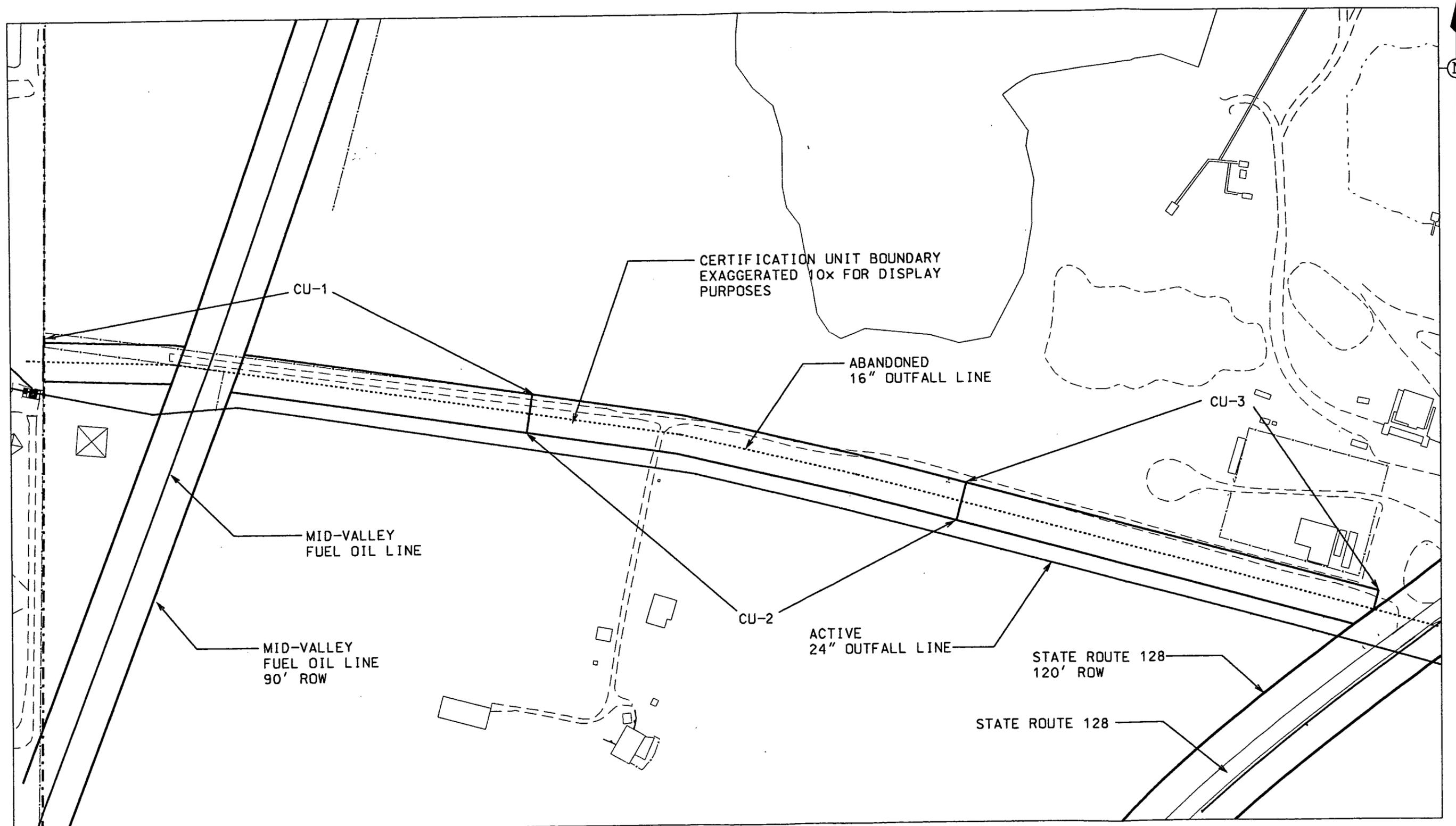
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24 4.3.1 Surface Samples (0 to 6-inch)

25 Two criteria must be met for the CU to pass certification. If the data distribution is normal or lognormal,
26 the first criterion compares the 95 percent Upper Confidence Limit (UCL) on the mean of each primary
27 COC to its FRL, or the 90 percent UCL on the mean of each secondary ASCOC. On an individual
28 CU basis, any ASCOC with the 95 percent UCL for primary ASCOCs (or 90 percent UCL for secondary
29 COCs) that are above the FRL results in that CU failing certification. If the data distribution is not normal
30 or lognormal, the appropriate nonparametric approach discussed in Appendix G of the SEP will be used to
31 evaluate the second criterion. The second criterion is the hot spot criterion, which states that primary or
32 secondary ASCOC results must not exceed two times the FRL. When the given UCL on the mean for each
33 COC is less than its FRL and the hot spot criterion is met, the CU will be considered certified.

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1 In the event that a CU fails certification, the following scenarios will be evaluated: 1) a high variability in
2 the data set, 2) localized contamination, and 3) widespread contamination. Details on the evaluation and
3 responses to these possible outcomes are provided in Section 3.4.5 of the SEP.
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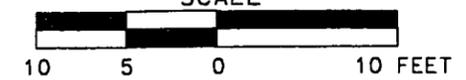


LEGEND:

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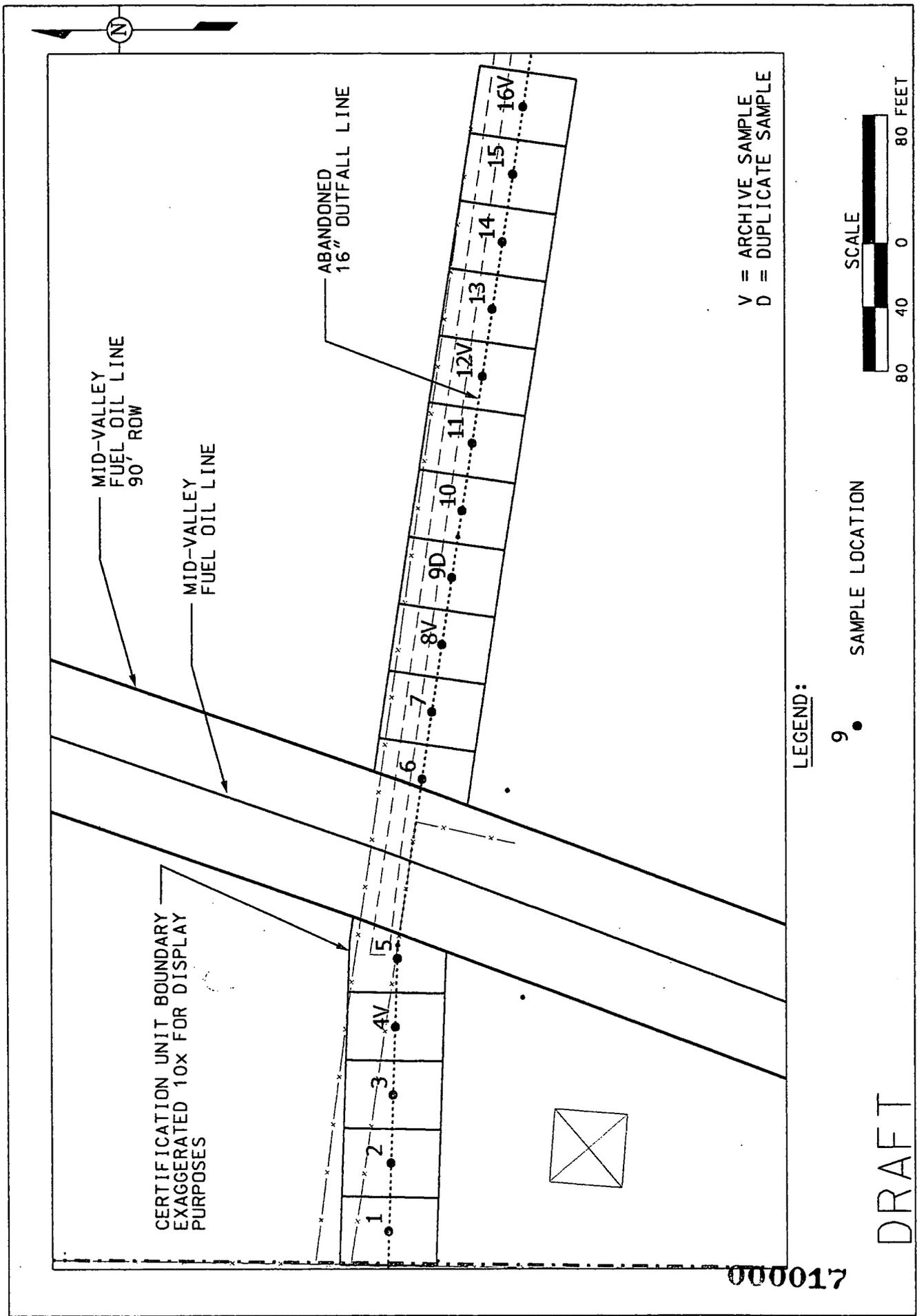
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FIGURE 4-1. AREA 9 PHASE III, PART ONE CERTIFICATION UNITS



V = ARCHIVE SAMPLE
 D = DUPLICATE SAMPLE

LEGEND:

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SAMPLE LOCATION

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FIGURE 4-2. CERTIFICATION SAMPLING LOCATIONS FOR CU 01

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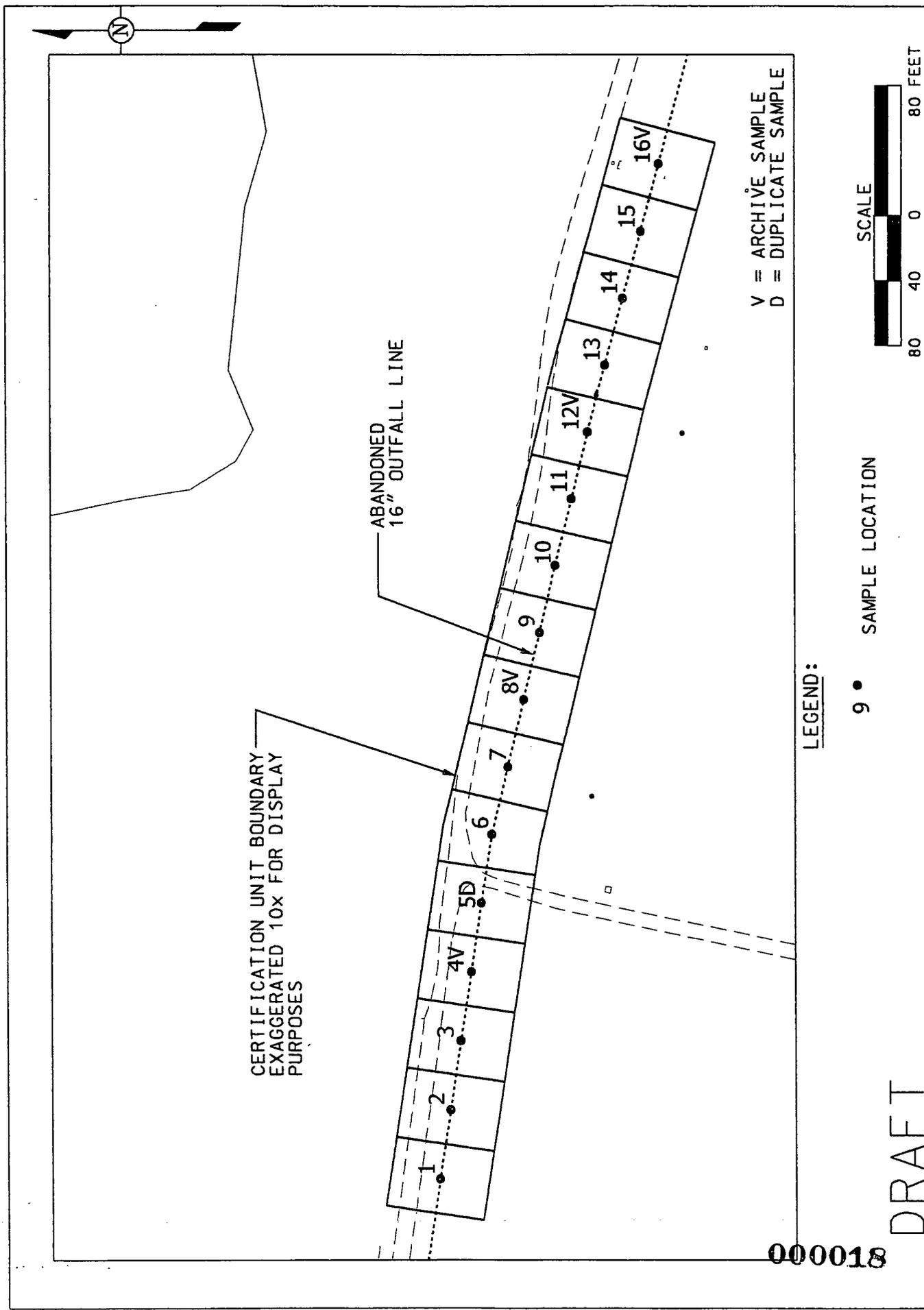
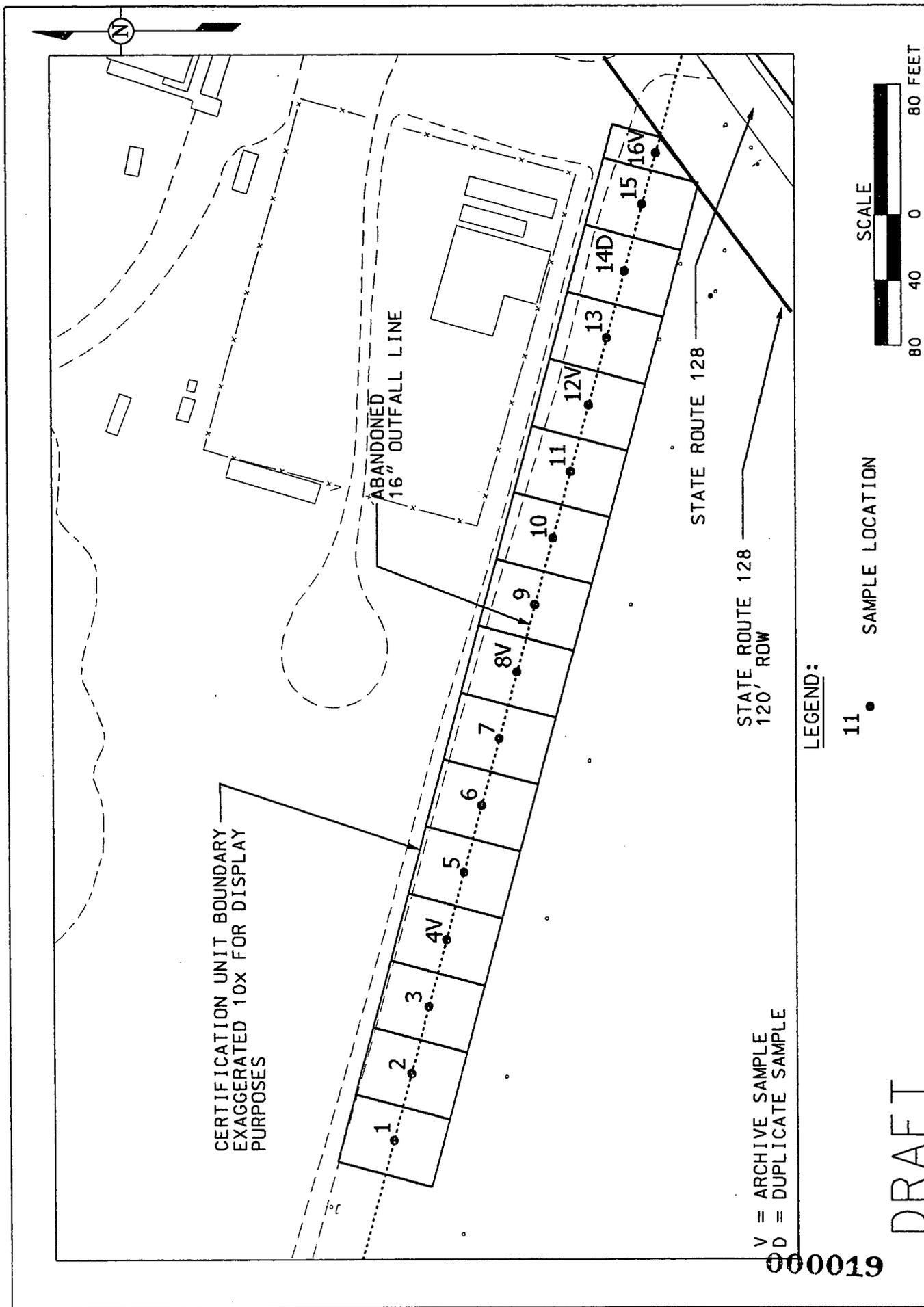


FIGURE 4-3. CERTIFICATION SAMPLING LOCATIONS FOR CU 02



CERTIFICATION UNIT BOUNDARY
EXAGGERATED 10x FOR DISPLAY
PURPOSES

ABANDONED
16" OUTFALL LINE

STATE ROUTE 128

STATE ROUTE 128
120' ROW

V = ARCHIVE SAMPLE
D = DUPLICATE SAMPLE

LEGEND:

● SAMPLE LOCATION



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5.0 SCHEDULE

The following draft schedule shows key activities for the completion of the work within the scope of this CDL. Implementation of this schedule is pending funding availability and property access. If necessary, an extension will be requested.

<u>Activity</u>	<u>Target Date</u>
Submittal of Certification Design Letter	June 14, 2004
Start of Certification Sampling	July 19, 2004
Complete Field Work	August 16, 2004
Complete Analytical Work	September 20, 2004
Complete Data Validation and Statistical Analysis	October 21, 2004
Submit Certification Report	December 1, 2004 ^a

^aOnly the date for submittal of the Certification Report is a commitment to the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency. Other dates are internal target completion dates.

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