



Department of Energy

**Ohio Field Office
Fernald Closure Project
175 Tri-County Parkway
Springdale, Ohio 45246
(513) 648-3155**



APR 15 2005

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0223-05

Mr. Thomas Schneider, Project Manager
Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF THE FINAL CERTIFICATION DESIGN LETTER FOR AREA 2,
PHASE II - SUBAREA 3 IMPACTED MATERIAL HAUL ROAD**

- References:
- 1) DOE-0057-05, W. Taylor to J. Saric/T. Schneider, "Transmittal of the Draft Certification Design Letter for Area 2, Phase II - Subarea 3 Impacted Material Haul Road," dated November 10, 2004
 - 2) DOE-0138-05, W. Taylor to J. Saric/T. Schneider, "Transmittal of Response to Ohio Environmental Protection Agency Comments on the Draft Certification Design Letter for Area 2, Phase II - Subarea 3 Impacted Material Haul Road," dated January 27, 2005
 - 3) Letter, T. Schneider to W. Taylor, "Disapproval - RTC Draft CDL for A2P2 SubA3," dated March 3, 2005
 - 4) Field Walkdown - Discussion, T. Schneider/D. Bohannon with J. Chiow/F. Miller, "Comments Responses on Certification Design Letter for Area 2, Phase II -Subarea 3 Impacted Material Haul Road," dated March 17, 2005

Enclosed for your review and approval are the revised Responses to Ohio Environmental Protection Agency (OEPA) Comments and the final Certification Design Letter (CDL) for Area 2, Phase II - Subarea 3 Impacted Material Haul Road (IMHR). The final CDL was revised to incorporate these revised comment responses. In the OEPA disapproval letter (Reference 3) of DOE's original RTCs (Reference 2), a meeting was suggested to provide more detailed justification. Therefore, a field walkdown with OEPA (Reference 4) of the IMHR was performed on March 17, 2005 to discuss DOE's RTCs, specifically responses to OEPA Comments 1, 2, 3, 5, 8, and 9. During that walkdown, further clarification was provided to satisfy Comment 1 and the approach was modified to include an additional certification unit with randomized sample locations to cover the ditch lines on either side of the northern section of the IMHR as requested by Comments 2 and 5. OEPA Comment 3 was generally resolved in the walkdown by visual inspection of the area that was excavated at the former wheel wash facility adjacent to the IMHR, which demonstrated that no flyash material was present in the area showing a clear delineation between the former Inactive Flyash Pile and the IMHR. Recent arsenic sampling results from the Equipment Wash Facility footprint provide additional information demonstrating that the arsenic results found in the southern end of the IMHR are similar to background subsurface conditions and not linked to the Inactive Flyash Pile. Comment 8 was addressed by clarifying that the soil immediately beneath the roadway was collected during sampling. Finally, during the walkdown, it was confirmed, as stated in the original response to Comment 9, that all area specific constituents of concern will be retained for evaluation for this certification effort.

As discussed in the field discussion, the comment responses have been revised along with the CDL to present the revised certification approach. 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 (2)

Mr. James A. Saric
Mr. Tom Schneider

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DOE-0223-05

Enclosures (2)

cc w/enclosures:

D. Pfister, OH/FCP

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, Fluor Fernald, Inc./MS78

cc w/o enclosures:

K. Alkema, Fluor Fernald, Inc./MS01

J. Chiou, Fluor Fernald, Inc./MS88

F. Johnston, Fluor Fernald, Inc./MS99

C. Murphy, Fluor Fernald, Inc./MS77

ECDC, Fluor Fernald, Inc./MS52-7

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**REVISED RESPONSES TO
OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE DRAFT
CERTIFICATION DESIGN LETTER
FOR AREA 2, PHASE II - SUBAREA 3
IMPACTED MATERIAL HAUL ROAD**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

APRIL 2005

U.S. DEPARTMENT OF ENERGY

