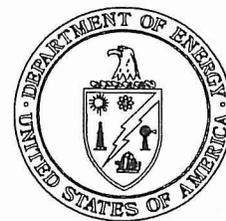




Department of Energy

Ohio Field Office
Fernald Closure Project
175 Tri-County Parkway
Springdale, Ohio 45246



OCT 11 2006

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-0007-07

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 RESPONSES TO U.S. ENVIRONMENTAL PROTECTION
AGENCY TECHNICAL REVIEW COMMENTS AND OHIO ENVIRONMENTAL
PROTECTION AGENCY COMMENTS ON THE DRAFT CERTIFICATION DESIGN
LETTER AND PROJECT SPECIFIC PLAN FOR AREA 7 MISCELLANEOUS AREAS**

- References:
- 1) Email, D. Bohannon to G. Lupton, "Questions on CDL A7 Misc Areas," dated October 2, 2006
 - 2) Letter, J. Saric to J. Reising, "Area 7 Miscellaneous CDL and PSP," dated October 4, 2006

Enclosed for your approval are responses to U.S. Environmental Protection Agency technical review comments and Ohio Environmental Protection Agency comments on draft Certification Design Letter (CDL) and Certification Project Specific Plan (PSP) for Area 7 Miscellaneous Areas. These comment responses are in answer to the above-listed references and will be incorporated into the final CDL and Certification PSP upon approval.

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

Sincerely,

Johnny W. Reising
Director

Enclosure: As Stated

Mr. James Saric
Mr. Thomas Schneider

-2-

DOE-0007-07

cc w/enclosure:

J. Desormeau, DOE-OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SRF-5J
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
S. Helmer, ODH

cc w/o enclosure:

J. Chiou, Fluor Fernald, Inc./MS88
F. Johnston, Fluor Fernald, Inc./MS12
C. Murphy, Fluor Fernald, Inc./MS1
T. Terry, Fluor Fernald, Inc./MS1

**RESPONSES TO THE U.S. ENVIRONMENTAL
PROTECTION AGENCY TECHNICAL REVIEW
COMMENTS AND OHIO ENVIRONMENTAL
PROTECTION AGENCY COMMENTS
ON THE DRAFT CERTIFICATION DESIGN LETTER
AND CERTIFICATION PROJECT SPECIFIC PLAN
FOR AREA 7 MISCELLANEOUS AREAS**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

OCTOBER 2006

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT CERTIFICATION DESIGN LETTER AND CERTIFICATION PROJECT
SPECIFIC PLAN FOR AREA 7 MISCELLANEOUS AREAS
(20500-PSP-0016, REVISION A)**

GENERAL COMMENT

Commenting Organization: U.S. EPA
Section #: Not Applicable (NA)
Original General Comment #: 1

Page #: NA

Commentor: Saric
Line #: NA

Comment: The purpose of the document is to describe a plan to demonstrate that soil in the Area 7 Miscellaneous Areas meet final remediation levels (FRL). However, the document indicates that soil sampling and analytical activities were already completed before the document was submitted for review and approval by the U.S. Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA). The Department of Energy (DOE) has completed these activities at risk. DOE may be required to conduct additional sampling activities based on U.S. EPA and OEPA review and approval of the document. The document should be revised to acknowledge that U.S. EPA and OEPA must approve all sampling activities before DOE submits the certification report for these areas.

Response: Agreed. The document will be amended to indicate that the U.S. EPA and OEPA must approve all sampling activities (i.e., this CDL/Certification PSP) prior to submission of the Certification Report.

Action: The Executive Summary will be changed as follows:

“Upon completion of the certification activities described in the final version of this document as approved by the US and OEPA, a Certification Report will be issued.”

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA
Tables #: 3-1 and 3-2
Original Specific Comment #: 1

Page #: 3-4

Commentor: Saric
Line #: NA

Comment: Table 3-1 states that lead, lead-210, manganese, thorium-230, cadmium, molybdenum, silver, and polyaromatic hydrocarbons (PAH) are secondary constituents of concern (COC) for Area 7. However, these COCs were not evaluated in Table 3-2 as to whether or not they will be retained as area-specific constituents of concern (ASCOC) for Area 7 Miscellaneous Areas. Table 3-2 should be revised to include lead, lead-210, manganese, thorium-230, cadmium, molybdenum, silver, and PAHs and provide a justification as to whether or not they will be retained as ASCOCs. Also, if it is determined that these COCs are indeed ASCOCs for Area 7 Miscellaneous Areas, the soil sampling locations proposed for Area 7 Miscellaneous Areas will need to be sampled for these ASCOCs. In addition, the text, tables in Section 4.0, and Appendix C should be reviewed and revised accordingly.

Response: Agreed.

Action: Table 3-2 will be amended to include all Area 7 ASCOCs from the SEP along with the reasoning for either retaining or eliminating the ASCOC. Also, the text and tables in Section 4.0 as well as Appendix C will be reviewed and amended if the changes to Table 3-2 indicate that this is necessary.

**RESPONSES TO THE
U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT CERTIFICATION DESIGN LETTER AND
CERTIFICATION PROJECT SPECIFIC PLAN FOR
AREA 7 MISCELLANEOUS AREAS**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

OCTOBER 2006

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT CERTIFICATION DESIGN LETTER AND CERTIFICATION PROJECT
SPECIFIC PLAN FOR AREA 7 MISCELLANEOUS AREAS
(20500-PSP-0016, REVISION A)**

GENERAL COMMENT

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: Not Applicable (NA)

Page #: NA

Line #: NA

Original General Comment #: 1

Comment: The purpose of the document is to describe a plan to demonstrate that soil in the Area 7 Miscellaneous Areas meet final remediation levels (FRL). However, the document indicates that soil sampling and analytical activities were already completed before the document was submitted for review and approval by the U.S. Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA). The Department of Energy (DOE) has completed these activities at risk. DOE may be required to conduct additional sampling activities based on U.S. EPA and OEPA review and approval of the document. The document should be revised to acknowledge that U.S. EPA and OEPA must approve all sampling activities before DOE submits the certification report for these areas.

Response: Agreed – The document will be amended to indicate that the US and OEPA must approve all sampling activities (i.e. this CDL/Certification PSP) prior to submission of the Certification Report.

Action: The Executive Summary will be changed as follows;

“Upon completion of the certification activities described in the final version of this document as approved by the US and OEPA, a Certification Report will be issued.”

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA

Commentor: Saric

Tables #: 3-1 and 3-2

Page #: 3-4

Line #: NA

Original Specific Comment #: 1

Comment: Table 3-1 states that lead, lead-210, manganese, thorium-230, cadmium, molybdenum, silver, and polyaromatic hydrocarbons (PAH) are secondary constituents of concern (COC) for Area 7. However, these COCs were not evaluated in Table 3-2 as to whether or not they will be retained as area-specific constituents of concern (ASCOC) for Area 7 Miscellaneous Areas. Table 3-2 should be revised to include lead, lead-210, manganese, thorium-230, cadmium, molybdenum, silver, and PAHs and provide a justification as to whether or not they will be retained as ASCOCs. Also, if it is determined that these COCs are indeed ASCOCs for Area 7 Miscellaneous Areas, the soil sampling locations proposed for Area 7 Miscellaneous Areas will need to be sampled for these ASCOCs. In addition, the text, tables in Section 4.0, and Appendix C should be reviewed and revised accordingly.

Response: Agreed.

Action: Table 3-2 will be amended to include all Area 7 ASCOCs from the SEP along with the reasoning for either retaining or eliminating the ASCOC. Also, the text and tables in Section 4.0 as well as Appendix C will be reviewed and amended if the changes to Table 3-2 indicate that this is necessary.

Commenting Organization: U.S. EPA

Section #: 5.0

Page #: 5-1

Commentor: Saric

Line #: NA

Original Specific Comment #: 2

Comment: The schedule indicates that sampling and analytical activities were completed before submittal and approval of the plan. As stated in General Comment 1, this work was completed at risk by DOE and may require additional sampling activities before DOE submits the certification report for these areas.

Response: Agreed

Action: See Action for General Comment #1.

**RESPONSES TO THE
U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT CERTIFICATION DESIGN LETTER AND
CERTIFICATION PROJECT SPECIFIC PLAN FOR
AREA 7 MISCELLANEOUS AREAS**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

OCTOBER 2006

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT CERTIFICATION DESIGN LETTER AND CERTIFICATION PROJECT
SPECIFIC PLAN FOR AREA 7 MISCELLANEOUS AREAS
(20500-PSP-0016, REVISION A)**

GENERAL COMMENT

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: Not Applicable (NA)

Page #: NA

Line #: NA

Original General Comment #: 1

Comment: The purpose of the document is to describe a plan to demonstrate that soil in the Area 7 Miscellaneous Areas meet final remediation levels (FRL). However, the document indicates that soil sampling and analytical activities were already completed before the document was submitted for review and approval by the U.S. Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA). The Department of Energy (DOE) has completed these activities at risk. DOE may be required to conduct additional sampling activities based on U.S. EPA and OEPA review and approval of the document. The document should be revised to acknowledge that U.S. EPA and OEPA must approve all sampling activities before DOE submits the certification report for these areas.

Response: Agreed – The document will be amended to indicate that the US and OEPA must approve all sampling activities (i.e. this CDL/Certification PSP) prior to submission of the Certification Report.

Action: The Executive Summary will be changed as follows;

“Upon completion of the certification activities described in the final version of this document as approved by the US and OEPA, a Certification Report will be issued.”

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA

Commentor: Saric

Tables #: 3-1 and 3-2

Page #: 3-4

Line #: NA

Original Specific Comment #: 1

Comment: Table 3-1 states that lead, lead-210, manganese, thorium-230, cadmium, molybdenum, silver, and polyaromatic hydrocarbons (PAH) are secondary constituents of concern (COC) for Area 7. However, these COCs were not evaluated in Table 3-2 as to whether or not they will be retained as area-specific constituents of concern (ASCOC) for Area 7 Miscellaneous Areas. Table 3-2 should be revised to include lead, lead-210, manganese, thorium-230, cadmium, molybdenum, silver, and PAHs and provide a justification as to whether or not they will be retained as ASCOCs. Also, if it is determined that these COCs are indeed ASCOCs for Area 7 Miscellaneous Areas, the soil sampling locations proposed for Area 7 Miscellaneous Areas will need to be sampled for these ASCOCs. In addition, the text, tables in Section 4.0, and Appendix C should be reviewed and revised accordingly.

Response: Agreed.

Action: Table 3-2 will be amended to include all Area 7 ASCOCs from the SEP along with the reasoning for either retaining or eliminating the ASCOC. Also, the text and tables in Section 4.0 as well as Appendix C will be reviewed and amended if the changes to Table 3-2 indicate that this is necessary.

Commenting Organization: U.S. EPA

Section #: 5.0

Page #: 5-1

Commentor: Saric

Line #: NA

Original Specific Comment #: 2

Comment: The schedule indicates that sampling and analytical activities were completed before submittal and approval of the plan. As stated in General Comment 1, this work was completed at risk by DOE and may require additional sampling activities before DOE submits the certification report for these areas.

Response: Agreed

Action: See Action for General Comment #1.