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Department of Energy

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FEB 22 2007

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

EMCBC-00297-07

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 THE ADDITIONAL OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON REVISION 0PCN1 AND THE FINAL CERTIFICATION REPORT FOR AREA 7 MISCELLANEOUS AREAS, REVISION 1

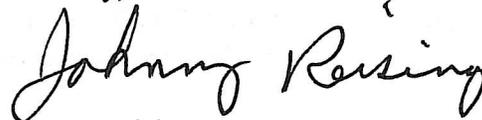
- References:
- 1) Letter DOE-0022-07, J. Reising to J. Saric/T. Schneider, "Transmittal of the Draft Certification Report for Area 7 Miscellaneous Areas," dated October 23, 2006
 - 2) Letter, J. Saric to J. Reising, "Area 7 Miscellaneous Areas Certification Report, Revision A," dated November 8, 2006
 - 3) Letter DOE-0067-07, J. Reising to J. Saric/T. Schneider, "Transmittal of Responses to U.S. Environmental Protection Agency Comments on the Draft Certification Report for Area 7 Miscellaneous Areas," dated November 16, 2006
 - 4) Letter, T. Schneider to J. Reising, "Disapproval - Draft Certification Report for Area 7 Miscellaneous Areas," dated November 20, 2006
 - 5) Letter DOE-0094-07, J. Reising to J. Saric/T. Schneider, "Transmittal of Responses to the Ohio Environmental Protection Agency Comments and the Final Certification Report for Area 7 Miscellaneous Areas," dated December 12, 2006
 - 6) Letter, T. Schneider to J. Reising, "Disapproval - Certification Report for Area 7 Miscellaneous Areas and Response to Comments," dated December 14, 2006

- 7) Letter, J. Saric to J. Reising, "Area 7 Miscellaneous Areas Certification Report Response to Comments," dated December 18, 2006
- 8) Letter EMCBC-00192-07, J. Reising to J. Saric/T. Schneider, "Transmittal of Responses to the Ohio Environmental Protection Agency Additional Comments and Change Pages to the Final Certification Report for Area 7 Miscellaneous Areas," dated January 9, 2007
- 9) Letter, J. Saric to J. Reising, "Area 7 Miscellaneous Areas Certification Report," dated January 30, 2007
- 10) Letter, T. Schneider to J. Reising, "Disapproval – Response to Comments to Ohio EPA Comments & Change Pages Final Certification Report Area 7 Miscellaneous Areas," dated January 25, 2007

Enclosed for your approval are the responses to the additional Ohio Environmental Protection Agency (OEPA) comments on Revision 0 PCN1 and the final Certification Report for Area 7 Miscellaneous Areas, Revision 1. All comment responses have been incorporated in Revision 1 of the final report. The U.S. Environmental Protection Agency (USEPA) approved the Certification Report for Area 7 Miscellaneous Areas as noted in Reference 9.

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

Sincerely,



Johnny Reising
Director, Fernald Closure Project

Enclosures: As Stated

cc w/enclosures:

Jack Craig, EMCBC

Robert Everson, EMCBC

T. Schneider, OEPA-Dayton (three copies of enclosures)

M. Cullerton, Tetra Tech

M. Shupe, HSI GeoTrans

S. Helmer, ODH

AR Coordinator, Fluor Fernald, Inc.

cc w/o enclosures:

F. Johnston, Stoller

P. Mohr, Fluor Fernald, Inc.

T. Terry, Fluor Fernald, Inc.

**RESPONSES TO
OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE
CHANGE PAGES FINAL CERTIFICATION REPORT
AND RTCs
FOR AREA 7 MISCELLANEOUS AREAS**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

FEBRUARY 2007

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE CHANGE PAGES FINAL CERTIFICATION REPORT AND RTCs
FOR AREA 7 MISCELLANEOUS AREAS
(20500-RP-0008, Revision 0)**

FERNALD CLOSURE PROJECT

COMMENTS

1. Commenting Organization: OEPA
Section #: Pg #: Line #: Commenter: OFFO
Original Comment# 13 and 15 Code: C

Comment: The responses to Original Comments 13 and 15 are now conflicting. #13 states "...the statistics in Appendix A-2 for CU 14 radium-226 were in error." #15 states, "For A7MA-C14 – Radium-226 – The statistics are correct". Since change pages were not provided for this section it is impossible to determine which response is correct. Please clarify the responses and provide a complete certification report with the next submittal.

Response: Comment #13 addresses the a posteriori sample size in Appendix A.2. After review, the statistics presented in the submitted Revision 1 are correct.

Comment #15 addresses the est. mean in Appendix A.3. After review, the statistics presented in the submitted Revision 1 are correct.

The apparent conflict between responses to comments #13 and #15 originates from a typographical error found in response to #15. As stated above, response #15 addresses information contained in Appendix A.3. However, the response addresses Appendix A.2, which was referenced in error. Where "A.2" was identified in response #15, "A.3" should have been the correct reference.

See attached Paraphrased Summary Table for the original comments and associated responses to # 13 and #15 for further clarification.

Action: The complete document will be submitted as Revision 1.

2. Commenting Organization: OEPA
Section #: Pg #: Line #: Commenter: OFFO
Original Comment# 4 Code: C

Comment: Second set of Comments, Comment 4: The response and revised text are acceptable. However, Ohio EPA has quickly reviewed the change page summary recently submitted for the LMIC and could not find reference to the addition of these pipes as specific inspection targets. Please provide a citation from the LMIC where the requirement to inspect these two pipes is detailed.

Response: Agreed.

Action: The LMICP will be updated via change pages to provide additional details regarding the inspections of these pipes.

Paraphrased Summary of Original Comments #13 and #15

SET 1

Original Comment #13

Appendix A.2 - CU4 (Total U and Ra226) a posteriori calcs appear incorrect and
Appendix A.2 - CU14 (Ra226) a posteriori calc appears incorrect

Response

For CU 4 (Total U) Appendix A.2 was incorrectly populated with information from Appendix A.1

For CU 4 and CU 14 (Ra226) a posterior calcs are correct as presented in the document

Original Comment #15

Appendix A.3 - CU 14 (Ra226) estimated mean appears to be incorrect

Response

For CU14 (Ra226) **Appendix A.3** was incorrectly populated with information from Appendix A.2

SET 2

Original Comment #13

Response stated that stats were correct for CU14 but the stats changed in latest revision of the document

Response

Agree. Need to ammend original (SET 1) RTCs to state that "CU14 Ra226 was incorrect with Appendix A.2 populated with infromation from Appendix A.1"

Original Comment #15

No change to **Appendix A.3** occurred as proposed by RTC

Response

No Change was actually necessary. Need to ammend original (SET 1) RTCs to state "CU 14 Ra226 in **Appendix A.2** was correct as written in the document"

This is where the typo occurred.

SET 3

Original Comment #13 and #15

Based on RTCs in SET 2, the responses to these two comments are now conflicting. As written, #13 states that stats from CU14 Ra226 **Appendix A.2** need to be corrected but #15 states that CU14 Ra226 **Appendix A.2** are correct.

Response

There was a typo in the SET 2 RTCs for comment #15. The RTC referenced **Appendix A.2** as being correct. However, the comment was discussing **Appendix A.3**. The appropriate RTC for #15 should have stated that **Appendix A.3** was correct as presented in the document.

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