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FEB 21 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-00290-07

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, THE COMMENTS ON THE FINAL REVISION 0 AND THE CERTIFICATION REPORT FOR AREA 6 SITEWIDE RAIL LINE SYSTEM, REVISION 1

References:

1) Letter DOE-0024-07, J. Reising to J. Saric/T. Schneider, "Transmittal of the Certification Report for Area 6 Sitewide Rail Line System, Revision A (20600-RP-0011)," dated October 27, 2006

2) Letter, J. Saric to J. Reising, "Area 6 Rail Certification Report," dated November 15, 2006

3) Letter DOE-0077-07, J. Reising to J. Saric/T. Schneider, "Transmittal of Responses to U.S. Environmental Protection Agency Technical Review Comments on the Draft Certification Report for Area 6 Sitewide Rail Line System," dated November 27, 2006

4) Letter, J. Saric to J. Reising, "Area 6 Sitewide Rail Line Certification Report RTC," dated December 18, 2006

5) Letter, T. Schneider to J. Reising, "Disapproval – Draft Certification Report for Area 6 Sitewide Rail Line System," dated December 19, 2006

6) Letter EMCBC-00215-07, J. Reising to J. Saric/T. Schneider, "Transmittal of Responses to Ohio Environmental Protection Agency Technical Review Comments on the Draft Certification Report for Area 6 Sitewide Rail Line System," dated January 18, 2007

7) Letter, J. Saric to J. Reising, "Area 6 Sitewide Rail Line Certification Report," dated January 30, 2007

8) Letter, T. Schneider to J. Reising, "Comments – Responses to OEPA Technical Review Comments on the Draft Certification Report for Area 6 Sitewide Rail Line System," dated February 5, 2007

Enclosed for your approval are the additional responses to Ohio Environmental Protection Agency (OEPA) comments on the final Revision 0 and the Certification Report for Area 6 Sitewide Rail Line System, Revision 1. All comment responses have been incorporated into Revision 1 of the final report. U.S. Environmental Protection Agency (USEPA) has approved the responses to their comments as noted in reference 7.

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

Sincerely,

Johnny Reising

Johnny Reising
Director
Fernald Closure Project

Enclosures: As stated

cc w/enclosures:
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, Inc
P. Mohr, Fluor Fernald, Inc.
T. Terry, Fluor Fernald, Inc.

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY TECHNICAL REVIEW COMMENTS ON THE FINAL CERTIFICATION REPORT FOR AREA 6 SITEWIDE RAIL LINE SYSTEM

FERNALD CLOSURE PROJECT
FERNALD, OHIO

FEBRUARY 2007

U.S. DEPARTMENT OF ENERGY

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY TECHNICAL REVIEW COMMENTS ON THE FINAL CERTIFICATION REPORT FOR AREA 6 SITEWIDE RAIL LINE SYSTEM (20600-RP-0011, Revision 0)

Comments:

1. Commenting Organization: OEPA Commenter: OFFO
Section #: Pg #: Line #: Code: C
Original Comment #11

Comment: Ohio EPA does not agree with the proposed method of addressing the PAH's as only ecological COCs. Where FRLs exist and those FRLs are exceeded, the certification must address them as potential human contaminants and evaluate the effectiveness of the cleanup as such. In the case of the PAH contaminants presented, Benzo(a)pyrene and Benzo(b)fluoranthene, the certification report must be revised to address them as FRL exceedances and certification failures. In addition, a discussion of the ecological impacts of the exceedances of BTVs should be included.

Response: Agreed. Because of the elevated PAH results, this area will be evaluated on a risk-basis. The information presented in Section 5.1 "Soil Under Rail Trestle" will be revised to reflect this and a section will be added to present the risk evaluation for the soil under the trestle.

DOE maintains that ecological risk due to PAH contamination under the rail trestle is limited. There are two potential concerns related to the soil concentration; exposure to terrestrial receptors and exposure to aquatic receptors from run-off into Paddys run. Given the screening-level process, bioavailability is not considered when evaluating exposure to terrestrial receptors. The mean concentrations associated with the rail trestle are not substantially higher than the conservative BTVs. While bioavailability of PAHs is dependent on a variety of factors, it is reasonable to assume that at least a portion of the soil concentration is not accessible to terrestrial receptors. This concept, coupled with the limited footprint of contamination, reduces the concern for impact to terrestrial receptors.

For surface water, only one sample appears to potentially impact aquatic receptors. Sample A6-UT-7 is located on the bank of Paddys Run at 553 MSL. This sample would be submerged during high water flows. All other samples are above the 2-year flood elevation. Therefore, exposure is extremely limited. Existing sediment data in the vicinity of the trestle supports this observation. No PAHs have been detected in sediment samples either upstream or downstream of the trestle.

Action: Section 5.1 will be amended to read as follows;

"For the soil under the rail trestle, all primary and secondary ASCOCs passed the certification criteria with the exception of a few PAHs. For those parameters where FRLs were established, benzo(a)pyrene and benzo(b)fluoranthene failed the certification criteria as discussed in Section 2.3. For those parameters without FRLs, BTVs were used as points of comparison. When using this convention, benzo(g,h,i)perylene, fluoranthene, phenanthrene, and pyrene exceeded the BTVs. Benzo(a)pyrene also failed the hotspot criteria. Because these 6 COCs exceed the limits that were used to evaluate them, it was decided to perform a

risk assessment on this CU, which is consistent with the SEP protocols which state that the need to excavate secondary COCs will be evaluated on a case by case basis. This was done to demonstrate that the residual contamination values in the CU remain protective of human health and the environment, per Section 10.1.1 of the OU5 ROD. This risk assessment, which is discussed in Section 5.2, determined that no further action was needed for this CU. "

A new Section 5.2 will be added to present the risk evaluation for the soil under the trestle.

2. Commenting Organization: OEPA Commenter: OFFO
Section #: 2.2.1 Pg #: 2-2, 2-3, & 2-4 Line #: Code: C
Original Comment#

Comment: Ohio EPA recommends the following sentence be added to the beginning of Secion 2.2.2 to help clarify the 20 CUs, "In addition to the 18 soil CUs, 2 ballast CUs are included in this document."

Response: Agreed.

Action: The above-suggested sentence will be added.

3. Commenting Organization: OEPA Commenter: OFFO
Section #: Figures 2-12 – 2-15 Pg #: Line #: Code: C
Original Comment#

Comment: Figures 2-12 through 2-15 do not designate that each of these areas are individual CUs. Please mark the figures appropriately.

Response: Agreed.

Action: The figures representing certification CUs will be amended. However, it should be noted that the sample locations illustrated in figure 2-15 are not certification samples. These samples were collected from "new" ballast in the rail yard primarily to assess levels of arsenic in ballast known to be unaffected by site operations.

4. Commenting Organization: OEPA Commenter: OFFO
Section #: 5.0 Pg #: 5-3 Line #: Code: C
Original Comment#

Comment: Though the text states that all ASCOCs passed certification, this is not accurate. Benzo(a)pyrene and Benzo(b)fluoranthene both fail certification on the 90% UCL and Benzo(a)pyrene fails the 2x the FRL criteria. The document must be revised to address these contaminants as FRL failures.

Response: See Response 1.

Action: See Action 1.

5. Commenting Organization: OEPA Commenter: OFFO
Section #: 5.0 Pg #: 5-3 Line #: Code: C
Original Comment#

Comment: In addition to the above, the text is incorrect in that a number of PAHs were compared to their FRLs not BTVs as suggested. The BTVs in nearly all cases are substantially lower than the respective FRLs. This is the case for Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(a)anthracene, Benzo(k)fluoranthene, Chrysene, and Indeno(1,2,3-cd)pyrene whose BTVs are all 1.0 mg/kg and Dibenzo(a,h)anthracene (BTV = 0.088 mg/kg). A separate paragraph and data table should be used for evaluating contaminants against their BTVs (note the current discussion of BTVs is grossly insufficient). This will reduce the confusion presented by the mix of BTVs and FRLs currently discussed in the text as well as presented in Appendix A.

Response: Agreed. This reference is in error and will be removed from the text. Where available, the FRLs are used in Appendix A. However, in the absence of these limits, the BTVs have been used. To alleviate confusion, were BTVs were used in the appendices, the number will be italicized and "No FRLs" will be noted in the table.

Action: Section 5.1 will be amended to remove the erroneous text. Where BTVs are used in the appendices, the number will be italicized and "No FRLs" will be noted in the table.

6. Commenting Organization: OEPA Commenter: OFFO
Section #: Appendix A Pg #: Line #: Code: C
Original Comment#

Comment: All contaminants listed with unit of measures as ug/kg should be revised to mg/kg to be consistent with the ROD FRLs and prior certification reports.

Response: All results are presented as reported by the laboratory. Converting these parameters to mg/kg would involve adding 3 zeros to the end of numbers which in some case are already fairly large. As agreed upon in the conference call with the OEPA on 2/6/07 these results will remain unchanged.

Action: None.

7. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: Appendix A Pg #: Line #: Code: C
Original Comment#

Comment: All contaminants listed with unit of measures as ug/kg should be revised to mg/kg to be consistent with the ROD FRLs and prior certification reports.

Response: All results are presented as reported by the laboratory. Converting these parameters to mg/kg would involve adding 3 zeros to the end of numbers which in some case are already fairly large. As agreed upon in the conference call with the OEPA on 2/6/07 these results will remain unchanged.

Action: None.