



Department of Energy

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



DEC -7 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-0083-07

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 OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS AND THE FINAL CERTIFICATION REPORT FOR VARIOUS AREAS OUTSIDE OF THE HISTORICALLY RADIOLOGICALLY CONTROLLED AREA

- References:
- 1) Letter DOE-0026-07, J. Reising to J. Saric/T. Schneider, "Transmittal of the Draft Certification Report for Various Areas Outside of the Historically Radiologically Controlled Area," dated October 24, 2006
 - 2) Letter, J. Saric to J. Reising, "Outside Historical Radiological Areas Certification Report," dated November 8, 2006
 - 3) Letter DOE-0068-07, 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 Various Areas Outside of the Historically Radiologically Controlled Area," dated November 16, 2006
 - 4) Letter, T. Schneider to J. Reising, "Disapproval - Certification Report for Various Areas Outside of the Historically Radiologically Controlled Area," dated November 17, 2006

Enclosed for your approval are responses to Ohio Environmental Protection Agency comments and the final Certification Report for Various Areas Outside of the Historically Radiologically Controlled Area. All comment responses have been incorporated into the final report.

Mr. James Saric
Mr. Thomas Schneider

-2-

DOE-0083-07

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

Sincerely,



Johnny W. Reising
Director

Enclosures

cc w/enclosures:

J. Desormeau, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosures)
G. Jablonowski, USEPA-V, SR-6J
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
S. Helmer, ODH
AR Coordinator, Fluor Fernald, Inc./MS12

cc w/o enclosures:

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

**RESPONSES TO
OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE DRAFT CERTIFICATION REPORT
FOR VARIOUS AREAS OUTSIDE OF THE HISTORICALLY
RADIOLOGICALLY CONTROLLED AREA**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

DECEMBER 2006

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE CERTIFICATION REPORT FOR VARIOUS AREAS OUTSIDE OF THE
HISTORICALLY RADIOLOGICALLY CONTROLLED AREA
(20500-RP-0006, Revision A)**

Comments:

1. Commenting Organization: Ohio EPA
Section #: ES Pg #: ES-1 Line #: 14 Commentor: OFFO
Original Comment #: 1 Code: E
Comment: Reference is made to the Outside Areas being made up of "20" Group 1 CUs. Please make the correction to "21."

Response: Agree.

Action: The text will be amended to reflect the correct number of CUs.

2. Commenting Organization: Ohio EPA
Section #: ES Pg #: ES-1 Line #: Commentor: OFFO
Original Comment #: 2 Code: C
Comment: V/FCN 20500-PSP-0015-1 was left out of this document. Please include it.

Response: The reference to V/FCN 20500-PSP-0015-1 was a typographical error. It should have been 20500-PSP-0014-1.

Action: The text will be amended to reference the correct V/FCN. This V/FCN is present in Appendix E.

3. Commenting Organization: Ohio EPA
Section #: ES Pg #: ES-2 Line #: Commentor: OFFO
Original Comment #: 3 Code: C
Comment: The document states that DOE plans "to proceed with the final land use activities as outlined in the Natural Resource Restoration Plan (DOE 2002)." What this document fails to point out is that the NRRP has not been finalized nor approved by the Agencies. Therefore, any restoration projects cannot yet be considered complete.

Response: Agree.

Action: This statement will be removed from the document.

4. Commenting Organization: OEPA
Section #: 2.0 Pg #: 2-7 Line #: NA Commenter: GeoTrans, Inc.
Original Comment #: 4 Code: C
Comment: Table 2-2 states Arsenic was not retained as an ASCOC, however Arsenic was an ASCOC for A7-C-AR and Utility Trench CU5.

Response: Agree.

Action: Table 2-2 will be amended to include arsenic.

5. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: 2.0 Pg #: Figs. Line #: NA Code: C
Original Comment #: 5
Comment: Figures 2-6, 2-7, 2-8, 2-9, 2-10, 2-11, and 2-12 contain invalid figure references. Figures 4-5, 4-7, 4-8, 4-9, 4-10, 4-11, 4-12, and 11 do not exist in this document.

Response: Agree.

Action: All figures in the document will be reviewed and corrected as needed.

6. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.2.1 Pg #: 2-3 Line #: 4-8 Code: C
Original Comment #: 6
Comment: The document states that samples were previously collected, under another document, to represent the certification samples for the Communications Hut. However, the data is not included in the certification report. In DOE's RTC's to Ohio EPA on June 5, 2006, the result of certification sampling was to be added to the document as Appendix F. Please include this appendix.

Response: Agree. The additional information will be included as an appendix.

Action: The information relating to the Communications Hut will be included as Appendix F in the document.

7. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.2.1 Pg #: 2-3 Line #: 4-8 Code: C
Original Comment #: 7
Comment: The document does not mention whether there were any real-time scans or "additional" physical samples collected "in" the parking lot of the Security Trailer Area?

Response: Agree.

Action: The additional real-time scans representing coverage "in" the parking lot of the Security Trailer Area will be added as Appendix G and text will be added referencing this information.

8. Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
Section #: 2.2.2 Pg #: 2-3 Line #: 34-35 Code: C
Original Comment #: 8
Comment: The text states archive samples "were not collected in any CU with the exception of CU 31". No CU 31 exists in the Outside Areas covered by this report.

Response: Agree. This text is erroneous. Archives were not collected in any CU related to this document.

Action: The incorrect reference will be removed.

9. Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
Section #: App. A.1 Pg #: 16, 17, and 21 Line #: NA Code: C
Original Comment #: 9
Comment: Est. Mean values calculated from data do not match Est. Mean values shown in Statistics Tables for A7-C-AR (Arsenic Est. Mean = 7.26, table shows 7.02), A7SAR-C01 (Radium-226 Est. Mean = 1.20, table shows 1.14), and A7SAR-C05 (Beryllium Est. Mean = 0.96, table shows 0.95).

