



Department of Energy

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



DEC 12 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-0094-07

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 AREA 7 MISCELLANEOUS AREAS

- 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

Enclosed for your approval are responses to Ohio Environmental Protection Agency comments and the final Certification Report for Area 7 Miscellaneous Areas. All comment responses have been incorporated into the final report.

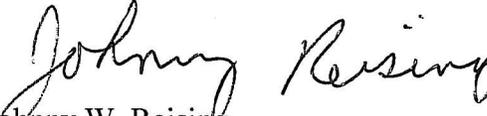
Mr. James Saric
Mr. Thomas Schneider

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DOE-0094-07

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
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS12

cc w/o enclosures:

J. Chiou, Fluor Fernald, Inc./MS1
F. Johnston, Fluor Fernald, Inc./MS12
P. Mohr, Fluor Fernald, Inc./MS1
T. Terry, Fluor Fernald, Inc./MS1

**RESPONSES TO
OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE
DRAFT CERTIFICATION REPORT
FOR AREA 7 MISCELLANEOUS AREAS**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

DECEMBER 2006

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE ADDENDUM TO THE DRAFT CERTIFICATION REPORT
FOR AREA 7 MISCELLANEOUS AREAS
(20500-RP-0008, Revision A)**

FERNALD CLOSURE PROJECT

COMMENTS

1. Commenting Organization: Ohio EPA
Section #: 2 Pg #: 2-1 Line #: 29 Commenter: GeoTrans, Inc.
Code: E
Original Comment #: 1
Comment: The reference to SEP Table 2-1 in this paragraph is incorrect. The text should read "Table 2-7."

Response: Agree.

Action: Text will be revised to read Table 2-7.

2. Commenting Organization: Ohio EPA
Section #: 2 Pg #: Table 2-2 Line #: 29 Commenter: GeoTrans, Inc.
Code: C
Original Comment #: 2
Comment: The justification "No above-FRLs present" requires some elaboration. What sampling event is this statement in reference to?

Response: Table 2-2 is a copy of Table 4-2 from Certification Design Letter and Certification Project Specific Plan for Area 7 Miscellaneous Areas, which is an approved document. The table was copied into the report so the reader would not need to reference the CDL/PSP.

Action: None.

3. Commenting Organization: Ohio EPA
Section #: Figure 2-8 Pg #: Line #: Commenter: OFFO
Code: E
Original Comment #: 3
Comment: Sub-CU 5 appears to be mislabeled as sub-CU 16, which gives the CU two sub-CU's with the number 16. Please correct.

Response: Agree.

Action: Figure 2-8 will be corrected.

4. Commenting Organization: Ohio EPA
Section #: Figure 2-9 Pg #: Line #: Commenter: OFFO
Code: E
Original Comment #: 4
Comment: Sub-CU 8 appears to be missing on CU 17.

Response: Sub-CU 8 is an archive sample located on the eastern side of the CU between CUs A7-MA-C17-7 and A7MA-C17-16 as shown on figure 2-9.

Action: None.

5. Commenting Organization: Ohio EPA Commenter: OFFO
 Section #: 3.0 Pg #: 3-1 Line #: 20-27 Code: C
 Original Comment #: 5
 Comment: The document references precertification sampling events conducted on a trench bottom as the result of utility removal. However, V/FCNs 20500-PSP-0009-36, 83, 97 and 20500-PSP-0010-10 are not included in the certification report. Please add them to Appendix B.

Response: Agree.

Action: The applicable variances will be added to Appendix B.

6. Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
 Section #: 3 Pg #: 3-1 Line #: 22 Code: C
 Original Comment #: 6
 Comment: The locations of the utility trenches should be shown on the figures.

Response: Agree.

Action: Figures 3-1 through 3-5 will be updated to include the location of the CU boundaries.

7. Commenting Organization: Ohio EPA Commenter: OFFO
 Section #: 3.1.2.1 Pg #: 3-2 Line #: 29-33 Code: C
 Original Comment #: 7
 Comment: Since the data from sampling effort was done under V/FCN 20500-PSP-0010-03 is included in Appendix A, shouldn't the V/FCN be included in the document as well?

Response: Agree.

Action: The variance will be added to Appendix B.

8. Commenting Organization: Ohio EPA Commenter: OFFO
 Section #: 3.1.3.1 Pg #: 3-3 Line #: 21 Code: C
 Original Comment #: 8
 Comment: A reference is made in regards to the Equipment Burial Area designated on Figure 1-2. However, Figure 1-2 is the FCP Certification Map. Please add the figure to the document addressing the Equipment Burial Area.

Response: Agree.

Action: Figure 3-6 will be amended to indicate the location of the Equipment Burial Area. The text will also be amended to reflect this.

9. Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
 Section #: 3 Pg #: 3-4 Line #: 13 Code: C
 Original Comment #: 9
 Comment: The locations of the buried pipes should be indicated on a figure in this document. Also, verification that all contaminated sediment was removed from the 60-inch pipe should be provided. The text should address why the decision was made to abandon the pipes in place and why the contents of the 18-inch pipe were not characterized.

Response: Agree. The locations of the buried pipes will be indicated on Figure 3-6. Text will be added to explain the decision to abandon portions of these two pipes in place.

11. Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
Section #: Attach A.1 Pg #: NA Line #: NA Code: C
Original Comment#: 11

Comment: Please provide details for *a posteriori* sample size calculations for A7MA-C04 Total Uranium, A7MA-C04 Arsenic, A7MA-C08 total Uranium, A7MA-C13 Arsenic, and A7MA-C15 Beryllium.

Response: Although minor changes occurred to the statistical data for these CUs, the *a posteriori* sample sizes remain unchanged. Further details of the basis of these statistical evaluations can be found in the Sitewide Excavation Plan.

Action: None.

12. Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
Section #: Attach A.1 Pg #: NA Line #: NA Code: C
Original Comment #: 12

Comment: The Est. Mean does not match the sample data for the following certification units:
A7MA-C04 Arsenic (Est. Mean = 9.29 vs. 8.90 in report), A7MA-C04 Beryllium (Est. Mean = 0.75 vs. 0.72 in report), and A7MA-C08 Total Uranium (Est. Mean = 8.25 vs. 8.2 in report).

Response: Agree.

Action: The mean will be updated with the correct value for CU A7MA-C04 (Arsenic and Beryllium), and CU A7MA-C08 (Total Uranium).

13. Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
Section #: Attach A.2 Pg #: NA Line #: NA Code: C
Original Comment #: 13

Comment: Please provide details for *a posteriori* sample size calculations for A7MA-C04 Total Uranium, A7MA-C04 Ra226, and A7MA-C14 Ra226.

Response: Upon review, the following was found.

For A7MA-C04 - Total Uranium - The statistics from Appendix A-1 were erroneously brought forward into Appendix A-2 for this parameter. The statistics for Total Uranium as they apply to A7MA-C04 will be corrected. For purposes of clarification, where multiple samples were collected from within the same sub-CU, the data used in the statistical evaluation of the CU is 1) the sample with the highest result between samples A7MA-C04-3 (the original sample) and A7MA-C04-3-D (the field duplicate) and 2) the sample with the highest result among samples A7MA-C04-6A (the excavated hotspot location), A7MA-C04-6N, A7MA-C0-6S, A7MA-C04-6E, A7MA-C04-6W (the four bounding locations), and A7MA-C04-18 (the random sample location). All six of these samples were collected from within sub-CU A7MA-C04-6.

For A7MA-C04 - Radium-226 - The statistics in Appendix A-2 are correct. For the purposes of clarification, where multiple samples were collected from within the same sub-CU, the data used in the statistical evaluation of the CU is 1) the sample with the highest result between samples A7MA-C04-3 (the original sample) and A7MA-C04-3-D (the field duplicate) and 2) the sample with the highest result among samples A7MA-C04-8A (the excavated hotspot location), A7MA-C04-8N, A7MA-C04-8S, A7MA-C04-8E, A7MA-C04-8W (the four bounding locations), and A7MA-C04-17 (the random sample location). All six of these samples were collected from within sub-CU A7MA-C04-8.

