



Department of Energy

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

DEC 15 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-0097-07

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:

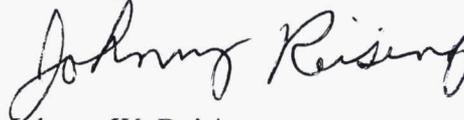
TRANSMITTAL OF RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY ADDITIONAL COMMENTS AND CHANGE PAGES TO THE FINAL CERTIFICATION REPORT FOR AREA 6 GENERAL AREA EAST

- References:
- 1) Letter DOE-0158-06, J. Reising to J. Saric/T. Schneider, "Transmittal of the Draft Certification Report for Area 6 General Area East," dated June 30, 2006
 - 2) Letter, J. Saric to J. Reising, "Area 6 General Area East Certification Report," dated July 31, 2006
 - 3) Letter, T. Schneider to J. Reising, "Comments - Certification Report for A6 General Area East," dated July 31, 2006
 - 4) Email, J. Chiou to T. Schneider, "Per Your Request - Draft OEPA RTC 7 on Draft Area 6 General Area East Certification Report," dated August 9, 2006
 - 5) Email, T. Schneider to J. Chiou, "FW: Per Your Request - Draft OEPA RTC 7 on Draft Area 6 General Area East Certification Report," dated August 10, 2006
 - 6) Letter DOE-0079-07, J. Reising to J. Saric/T. Schneider, "Transmittal of Responses to Ohio Environmental Protection Agency Comments and the Final Certification Report for Area 6 General Area East," dated November 28, 2006
 - 7) Letter, T. Schneider to J. Reising, "Disapproval - Certification Report for Area 6 General Area East," dated December 11, 2006

Enclosed for your approval are responses to Ohio Environmental Protection Agency (OEPA) additional comments and change pages to the Final Certification Report for Area 6 General Area East. Also, enclosed are the revised responses to the original OEPA comments as requested per Reference 7. All comment responses have been incorporated into the Change Pages of the Final Report.

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 enclosure)
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./MS88
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
FINAL CERTIFICATION REPORT
FOR AREA 6 GENERAL AREA EAST**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

DECEMBER 2006

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE DRAFT CERTIFICATION REPORT FOR AREA 6 GENERAL AREA EAST
(20600-RP-0007, Revision 0)**

COMMENTS

1. Commenting Organization: OEPA Commenter: OFFO
Section #: RTC #3 Pg #: Line #: NA Code: C
Original Comment# 3

Comment: The referenced variances are not included in Appendix D as stated in the document.

Response: Agreed – The referenced variances were inadvertently excluded.

Action: The referenced variances will be included in Appendix D of the document.

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

Comment: The referenced variance is not included in Appendix D as stated in the document.

Response: Agreed – The referenced variances were inadvertently excluded.

Action: The referenced variances will be included in Appendix D of the document.

3. Commenting Organization: OEPA Commenter: OFFO
Section #: RTC#7 Pg #: Line #: NA Code: C
Original Comment# 7

Comment: The response suggests the Addendum will be submitted to the agencies. In the Addendum was submitted to the agencies on September 5, 2006 and subsequently approved. The response should be revised to clarify the document was submitted and approved by the agencies.

Response: Agreed.

Action: The RTC will be amended to contain more information relating to the submission and approval of this document.

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

Comment: A significant portion of the certification data is “J” qualified. Specifically entire CU of a particular analytes are J qualified raising questions about the certification for those analytes. This is especially troubling for contaminants who’s cleanup levels are close to the reported concentrations and those concentrations are all estimated. The certification becomes even more likely to be invalid in those CUs where above FRL concentrations are detected and yet all the data is qualified leading the reviewer to believe the area is not appropriately characterized. This is clearly evident for Ra-226 in CUs 7,11, and 15. In CU 11, every sample for Th-232, Th-228, Ra-228 and Ra-226 is estimated. Additional discussion and likely re-analysis is needed to justify these certification data as being acceptable.

Response: The cited radiological data underwent further review by the Data Validation Section of the Quality Assurance Department to evaluate the applicability of the "J" qualifiers used for the indicated CUs in this certification report. This reassessment of the data identified one major condition under which the "J" qualifier was used – field/laboratory duplicate imprecision.

As a result of this condition, all data associated with the field or laboratory duplicate are required to be qualified with a "J" per the Radiological Data Validation Evaluation Procedure used at the Fernald Site which is derived from the Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) and the draft ANSI standard. As each CU is analyzed as a single analytical batch, the entire CU for that parameter is then required to be qualified with a "J". This gives the undue impression that each individual analytical result has a unique quality issue. However, in these cases, a single duplicate imprecision caused the qualification of the entire dataset (CU).

It is important to note that the stated duplicate imprecision criterion is not matrix specific (i.e. the criterion used to evaluate soil matrices is the same criterion used for water). Methods of evaluation for other analytical fields (e.g. metals, VOAs, etc.) recognize the inherently greater imprecision to be found in soil versus water analyses and allowances of greater variability are given appropriate consideration. However, there is no such allowance for radiological data.

Of the 9 data sets where this occurred only 3 had 1 OR 2 above-FRL results included as part of the data set with *a posteriori* sample sizes of 4, 6, and 6 respectively for CUs 7, 11, and 15. . Also, taken independently of the duplicate information, the data sets are considered to be typical of the data seen in site soils from a data quality standpoint. .

Given this, it is believed that in this particular circumstance the use of the "J" qualifier in no way invalidates the data set, that the area has been appropriately characterized and no further justification of the certification data is needed

Action: The information presented above will be added to Section 5 Data Evaluation and Conclusions of the certification report.

5. Commenting Organization: OEPA

Commenter: OFFO

Section #: ES Pg #: ES-2

Line #: NA

Code: C

Original Comment#

Comment: This section references the Addendum to the CDL. The paragraph should either refer to Appendix E for the Addendum or provide a citation for the actual document submittal to the agencies.

Response: Agreed.

Action: Appendix E for the Addendum will be referred to in this section.

6. Commenting Organization: OEPA

Commenter: OFFO

Section #: ES

Pg #: ES-2

Line #:

Code: C

Original Comment#

Comment: The document states that DOE plans "to proceed with the final land use activities as outlined in the Natural Resource Restoration Plan (DOE2002)." 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: Agreed.

Action: This sentence will be removed from the document.

7. Commenting Organization: OEPA
Section #: 3.1 Pg #: 3-1 Line #: NA Commenter: OFFO
Original Comment# Code: C

Comment: The variances referenced in this section are not included in Appendix D.

Response: Agreed – The referenced variances were inadvertently excluded.

Action: The referenced variances will be included in Appendix D of the document.

8. Commenting Organization: OEPA
Section #: 3.2 Pg #: 3-1 Line #: NA Commenter: OFFO
Original Comment# Code: C

Comment: The Addendum should be referenced as Appendix E or a correct citation for the submitted document.

Response: Agreed.

Action: Appendix E for the Addendum will be referred to in this section.

9. Commenting Organization: OEPA
Section #: 3.2 Pg #: 3-1 Line #: NA Commenter: OFFO
Original Comment# Code: C

Comment: V/FCN referenced in the last paragraph is not included in Appendix D.

Response: Agreed – The referenced variances were inadvertently excluded.

Action: The referenced variances will be included in Appendix D of the document.

**REVISED RESPONSES TO
OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE
DRAFT CERTIFICATION REPORT
FOR AREA 6 GENERAL AREA EAST**

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FERNALD, OHIO**

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