Department of Energy

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

NOV 16 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-0067-07

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 U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE DRAFT 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

Enclosed for your approval are responses to U.S. Environmental Protection Agency comments on the draft Certification Report for Area 7 Miscellaneous Areas. Upon receipt and approval of all comment responses, all responses will be incorporated into the final report.

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

Sincerely,

Johnny Reising

Johnny W. Reising
Director

Enclosure

cc w/enclosure:
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
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS12

cc w/o enclosure:
J. Chiou, Fluor Fernald, Inc./MS88
F. Johnston, Fluor Fernald, Inc./MS12
C. Murphy, Fluor Fernald, Inc./MS1
T. Terry, Fluor Fernald, Inc./MS1

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RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY TECHNICAL REVIEW COMMENTS ON THE DRAFT CERTIFICATION REPORT FOR AREA 7 MISCELLANEOUS AREAS

FERNALD CLOSURE PROJECT
FERNALD, OHIO

NOVEMBER 2006

U.S. DEPARTMENT OF ENERGY

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY TECHNICAL REVIEW COMMENTS ON THE DRAFT CERTIFICATION REPORT FOR AREA 7 MISCELLANEOUS AREAS (20500-RP-0008, Revision A)

COMMENTS

1. Commenting Organization: U.S. EPA Commenter: Saric
Section #: Not Applicable (NA) Page #: A.1-5 Line #: NA
Original General Comment #: 1
Comment: The certification report provides information and data to demonstrate that soil in 18 certification units (CU) in the Area 7 Miscellaneous Areas meets final remediation levels (FRL). The scope of the certification report includes Area 7G (Converted Advanced Wastewater Treatment Plant and surrounding area). The CAWWT Backwash Basin is CU 18 in the certification report. The certification report should be revised to discuss why no sampling was proposed or a CU established for the area north of the CAWWT Backwash Basin (CU 18) in Area 7G as shown in Figure 2-1.

Response: Agreed. No sampling has been done in the area where the CAWWT Facility stands because this facility is currently functional and the footprint is not available at this time. Certification sampling will be required in the building footprint after removal of the facility.

Action: The text and all appropriate figures will be amended to indicate that the area is the Footprint of the current CAWWT Facility.

2. Commenting Organization: U.S. EPA Commenter: Saric
Figure #: NA Page #: NA Line #: NA
Original Specific Comment #: 1
Comment: Figure 1-1 depicts the layout of Area 7 Miscellaneous Areas that is to be certified under the certification report. According to the hatched marks that depict the layout, the area located just north of the CAWWT Backwash Basin (CU 18) is to be certified under this certification report. As discussed in General Comment No. 1, no CU was established for this area. The text and Figure 1-1 should be revised to resolve this discrepancy.

Response: See response to Comment #1.

Action: See action to Comment #1.

3. Commenting Organization: U.S. EPA Commenter: Saric
Table #: 2-2 Page #: 2-5 Line #: NA
Original Specific Comment #: 2
Comment: Table 2-2 should be revised to list sampling CU 18 for technetium-99, beryllium, aroclor-1254, and aroclor-1260.

Response: Agreed

Action: Table 2-2 will be revised to list that CU 18 was sampled for technetium-99, beryllium, aroclor-1254, and aroclor-1260.

4. Commenting Organization: U.S. EPA Commenter: Saric
Figure #: 2-1 Page #: NA Line #: NA

Original Specific Comment #: 3
Comment: Figure 2-1 identifies a square area located north of CU 18 that has not been designated as a CU. Figure 2-1 and the text should be revised to state why this area is not designated as a CU and whether or not it is being certified as part of this certification report.

Response: See Response to Comment #1.

Action: See Action to Comment #1.

5. Commenting Organization: U.S. EPA Commenter: Saric
Figure #: 2-4 Page #: NA Line #: NA
Original Specific Comment #: 4
Comment: Figure 2-4 identifies a square area located north of CU 18 that has not been designated as a CU. Figure 2-4 and the text should be revised to state why this area is not designated as a CU and whether or not it is being certified as part of this certification report.

Response: See Response to Comment #1.

Action: See Action to Comment #1.

6. Commenting Organization: U.S. EPA Commenter: Saric
Section #: 2-4 Page #: 3-3 Line #: 21
Original Specific Comment #: 5
Comment: The text states that five perchloric acid fume hoods were excavated in August 2005 and refers to Figure 1-2. Figure 1-2 does not show the location of the five fume hoods. The text should be revised to refer to the correct figure that shows the location of the five fume hoods.

Response: Agreed. Figure 1-2 was incorrectly identified as the figure of reference. CU A7MA-C07 was designed around the boundary of the five perchloric acid fume hoods excavation. The location of this excavation (i.e. CU A7MA-C07) is shown in Figure 2-1.

Action: The text shall be updated to include a reference to Figure 2-1.