



Department of Energy

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



NOV 9 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-0059-07

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 THE RESPONSE TO OHIO ENVIRONMENTAL PROTECTION
AGENCY COMMENT ON ADDENDUM 1 TO THE CERTIFICATION DESIGN
LETTER AND CERTIFICATION PROJECT SPECIFIC PLAN FOR AREA 6 FORMER
PRODUCTION AREA AND MAIN DRAINAGE CORRIDOR AREA FOR THE
CERTIFICATION OF THE FORMER SOIL PILE-8 AREA**

- References:
- 1) "Certification Design Letter and Certification Project Specific Plan for Area 6 Former Production Area and Main Drainage Corridor Area," Document 20810-PSP-0010, dated January 2006
 - 2) Letter DOE-0027-06, J. Reising to J. Saric/T. Schneider, "Transmittal of Addendum 1 to the Certification Design Letter and Certification Project Specific Plan for Area 6 Former Production Area and Main Drainage Corridor Area for the Certification of the Former Soil Pile-8 Area," dated October 23, 2006
 - 3) Letter, T. Schneider to J. Reising, "Disapproval Addendum 1 to the CDL and Certification PSP for A6 FPA and MDC for the Certification of the SP-8 Area," dated November 2, 2006
 - 4) Letter, J. Saric to J. Reising, "Area 6 SP8 Addendum 1 CDL and Certification PSP," dated November 8, 2006

Enclosed for your approval is the response to the Ohio Environmental Protection Agency comment and associated corrected figure on Addendum 1 to the Certification Design Letter and

Mr. James Saric
Mr. Thomas Schneider

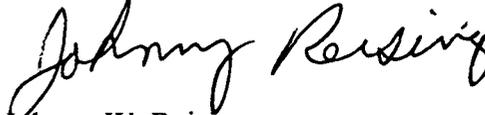
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DOE-0059-07

Certification Project Specific Plan for Area 6 Former Production Area and Main Drainage Corridor Area for the Certification of the Former Soil Pile-8 Area as noted in Reference 3. This replacement figure completes the necessary changes to the addendum. The U.S. Environmental Protection Agency has approved this addendum as noted in Reference 4.

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

Sincerely,



Johnny W. Reising
Director

Enclosure

cc w/enclosure:

J. Desormeau, DOE-OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SRF-5J
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
S. Helmer, 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

**RESPONSE TO THE OHIO ENVIRONMENTAL
PROTECTION AGENCY COMMENT
ON ADDENDUM 1 TO THE
CERTIFICATION DESIGN LETTER AND
CERTIFICATION PROJECT SPECIFIC PLAN
FOR AREA 6 FORMER PRODUCTION AREA
AND MAIN DRAINAGE CORRIDOR AREA
FOR THE CERTIFICATION OF
THE FORMER SOIL PILE-8 AREA**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

NOVEMBER 2006

U.S. DEPARTMENT OF ENERGY

**RESPONSE TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENT
ON ADDENDUM 1 TO THE CERTIFICATION DESIGN LETTER AND
CERTIFICATION PROJECT SPECIFIC PLAN FOR
AREA 6 FORMER PRODUCTION AREA AND MAIN DRAINAGE CORRIDOR AREA
FOR THE CERTIFICATION OF THE FORMER SOIL PILE-8 AREA
(20810-PSP-0010, Revision 0, Addendum 1)**

SPECIFIC COMMENT

Commenting Organization: Ohio EPA

Commentor: Schneider

Section #: 2.2.1/Figure A-8

Page #: 2-1 & Appendix A

Line #: 29-32

Original General Comment #: 1

Comment: The text states that "above-FRL radium 226 conditions were found" several times during precertification, and that additional excavation took place until the real-time scans showed conditions passed. However, the text does not correspond with the data on Figure A-8, which shows that Ra-226 still remains. Please provide clarification in the text and include the real-time data showing that the Ra-226 has been removed.

Response: Figure A-8 (Phase 3 real-time measurements) shows several HPGe measurement results in the same general location that are overlaid on each other. These measurements were taken in succession after each excavation until the HPGE measurements indicated radium-226 results <3*FRL. Although the data on Figure A-8 is plotted chronologically (to show the passing result on top), this is not readily apparent on the map due to the hotspot results (in red) beneath the final clean result (in green) and the use of thin-line circles. The map has been revised to show the final clean radium-226 results as solid green circles to clearly illustrate that the radium-226 hotspots were excavated.

The text in Section 2.2.1 is correct and no revision is necessary.

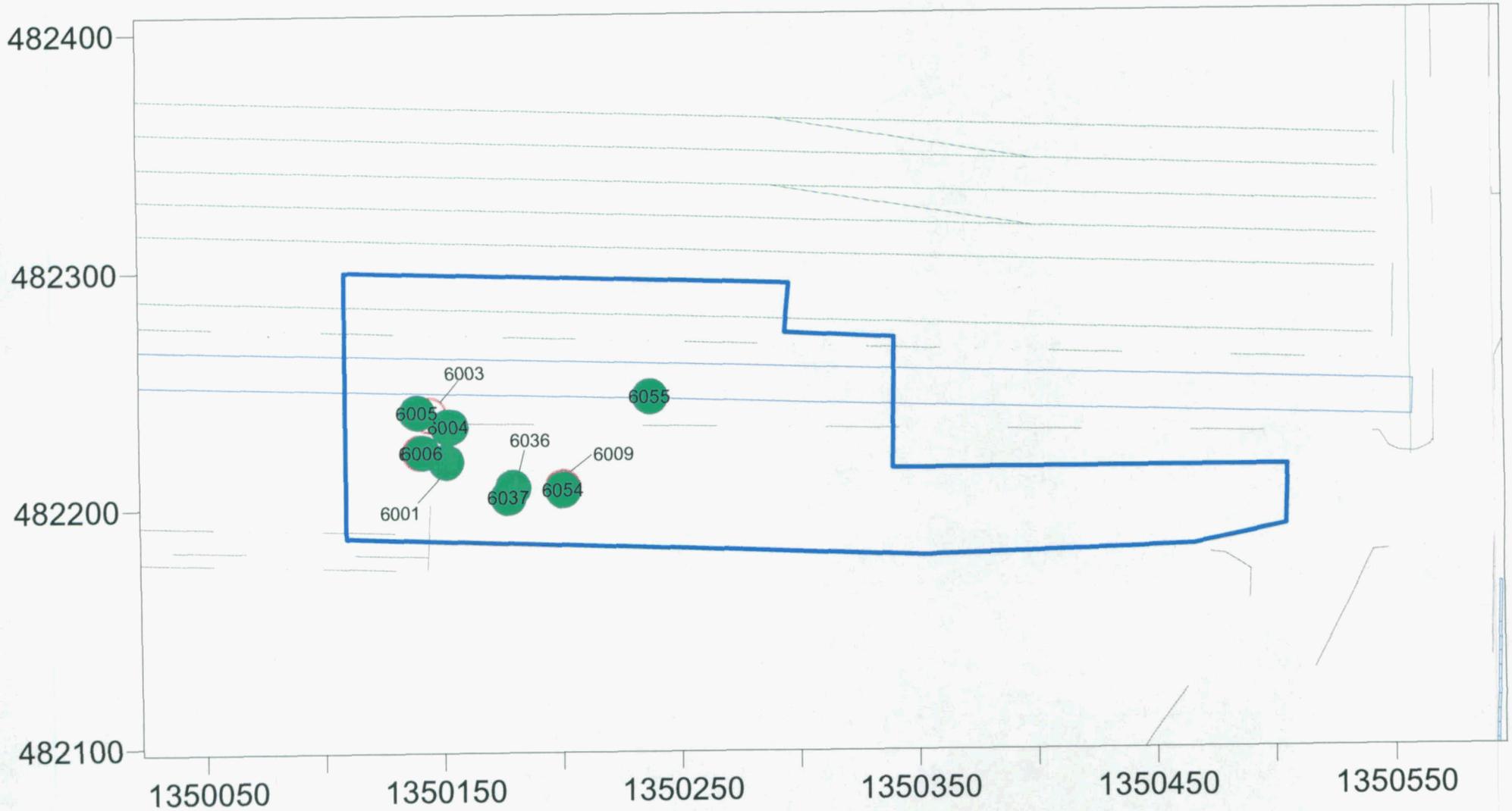
Action: Figure A-8 (enclosed) was revised to clearly indicate that final radium-226 results were <3*FRL.

Figure A-8 Soil Pile 8 Area - Phase 3 Moisture Corrected Radium-226



Data Groups: 30687_10-21-2006, 40293_10-21-2006, 30699_10-22-2006
40293_10-22-2006

Measurement Period: 10-21-2006 thru 10-22-2006



HPGe Ra-226 pCi/g

● -999 to 5.1

○ 5.1 to 999

RTIMP DWG ID: SP8_P3_RA.srf

Project ID: Gen Char For Site Soil Remed - 20300-PSP-0011

Prepared: D.Seiller 10-23-2006; M. Frank 11-03-2006

Support Data: SP8_P3.xls