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-0060-07

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 THE FORMER STORM WATER RETENTION BASIN AREA

References:
1) Letter DOE-0015-07, J. Reising to J. Saric/T. Schneider, "Transmittal of the Draft Certification Report for the Former Storm Water Retention Basin Area, Revision A (20500-RP-0005)," dated October 19, 2006

2) Letter, J. Saric to J. Reising, "Storm Water Retention Basin Area Certification Report," dated October 30, 2006

Enclosed for your approval are responses to U.S. Environmental Protection Agency comments on the draft Certification Report for the Former Storm Water Retention Basin Area. Upon approval, these comment 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, 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./MS6

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

RESPONSES TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY TECHNICAL REVIEW COMMENTS ON THE DRAFT CERTIFICATION REPORT FOR THE FORMER STORM WATER RETENTION BASIN AREA

FERNALD CLOSURE PROJECT
FERNALD, OHIO

NOVEMBER 2006

U.S. DEPARTMENT OF ENERGY

RESPONSE TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY TECHNICAL REVIEW COMMENT ON THE DRAFT CERTIFICATION REPORT FOR THE FORMER STORM WATER RETENTION BASIN AREA (20500-RP-0005, REVISION A)

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.2.4 Page #: NA Line #: Not Applicable (NA)
Original Specific Comment #: 1
Comment: The notes in Figures 2-3, 2-4 and 2-5 of the Certification Report refer to other figures (Figures 4-3, 4-4 and 4-5). Figures 4-3, 4-4 and 4-5 were part of the Certification Design Letter and Certification Project Specific Plan. The notes in Figures 2-3, 2-4 and 2-5 of the Certification Report should be revised to refer to Figures 2-3, 2-4 and 2-5 that are included as part of the Certification Report.

Response: Agree.

Action: Figures will be corrected.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 5.1.1 Page #: 5-1 Line #: 24 and 25
Original Specific Comment #: 2
Comment: The text states Certification Unit (CU) SWRB-C04 passed all of the certification criteria. However, data presented on Page B-15 in Appendix B indicates that uranium exceeded the final remediation level (FRL) of 82 milligrams per kilogram (mg/kg) in sample location SWRB-C04-3 (96.3 mg/kg) and no statistical analysis was performed. The table for CU SWRB-C04 in Appendix B should be revised to include a statistical analysis for uranium and the text in Section 5.1.1 should be revised if necessary.

Response: Agree.

Action: The table for CU SWRB-C04 in Appendix B will be revised to include the statistical analysis for total uranium, which demonstrates passing conditions for total uranium.

Commenting Organization: U.S. EPA Commentor: Saric
Table #: 5.1.1 Page #: 5-1 Line #: 28 through 32
Original Specific Comment #: 3
Comment: The text states that within CU SWRB-C05 that sample location SWRB-C05-13 exceeded the aroclor-1254 FRL of 130 micrograms per kilogram (µg/kg) and was removed because it was located in an area of known buried asbestos. The text should be revised to state whether the known buried asbestos was excavated and removed. Also, data presented on Page B-16 in Appendix B indicated that aroclor-1254 exceeded the FRL of 130 µg/kg in sample location SWRB-C05-8 (180 µg/kg) and no statistical analysis was performed. The table for CU SWRB-C05 in Appendix B should be revised to include a statistical analysis for aroclor-1254 using sample location SWRB-C05-8 as the maximum result and the text in Section 5.1.1 should be revised if necessary.

Response: Agree.

Action: The text in Section 5.1.1 will be revised to state that the known buried asbestos was excavated per the Area 7 Support and Silos Process Areas Excavation Plan. The table for CU SWRB-05 in Appendix B will be revised to include the statistical analysis for aroclor-1254 using sample location SWRB-C05-8 as the maximum result, which demonstrates passing conditions for aroclor-1254.