



Department of Energy

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



NOV 27 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-0076-07

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 TECHNICAL REVIEW COMMENTS ON THE DRAFT CERTIFICATION
REPORT FOR AREA 7 SILOS AND SUPPORT AREA**

- References: 1) Letter DOE-0046-07, J. Reising to J. Saric/T. Schneider, "Transmittal of the Draft Certification Report for Area 7 Silos and Support Area," dated November 3, 2006
- 2) Letter, J. Saric to J. Reising, "Area 7 Silos and Support Area Certification Report," dated November 15, 2006

Enclosed for your approval are responses to U.S. Environmental Protection Agency technical review comments on the draft Certification Report for Area 7 Silos and Support Area. Upon receipt and approval of all comments, the 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 W. Reising
Director

Enclosure

Mr. James Saric
Mr. Thomas Schneider

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DOE-0076-07

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
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

**RESPONSES TO
U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT CERTIFICATION REPORT FOR
AREA 7 SILOS AND SUPPORT AREA**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

NOVEMBER 2006

U.S. DEPARTMENT OF ENERGY

**RESPONSE TO U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS RESPONSE ON THE
DRAFT CERTIFICATION REPORT FOR
AREA 7 SILOS AND SUPPORT AREA
(20500-RP-0009, Revision A)**

COMMENT

Commenting Organization: U.S. EPA

Commenter: Saric

Section #: Executive Summary

Pg #: ES-1

Line #: 35 and 36

Original Comment #: 1

Comment: The text states that certification units (CU) 2, 11, 12, 13, and 15 failed the statistical and/or hotspot criterion. The text should be revised to state that CU 10 failed the hotspot criterion for several polyaromatic hydrocarbons (PAH) and aroclor-1254.

Response: Agreed. Additional information will be added to indicate that CU 10 failed the hotspot criteria for aroclor-1254. However, the PAHs were retained in the area as ecological COCs. These PAHs were not retained as Area Specific Constituents of Concern. Subsequently, there is no hotspot criterion for the ecological COCs (PAHs), which were evaluated against established BTVs per Section 2.1.4 of the SEP. Because of the nature of the screening process, BTV exceedances do not necessarily indicate that impact to ecological receptors will occur. Instead, it indicates the need for further evaluation.

Action: The text in the Executive Summary will be amended to read as follows.

“After the initial certification samples were collected, analyzed, and validated; CUs 11, 12, 13, and 15 failed the statistical and/or hotspot criteria for radium-226. CU 2 failed for arsenic. CU 10 failed the hotspot criteria for aroclor-1254. Additional excavation and sampling were required to remove contamination for these parameters and pass the certification criteria. The certification details are provided in Section 3.2 of this document.”

Commenting Organization: U.S. EPA

Commenter: Saric

Table #: 2-1

Pg #: 2-5

Line #: NA

Original Comment #: 2

Comment: Table 2-1 is missing chromium as a secondary constituent of concern (COC) for Area 7.

Table 2-1 should be revised to include chromium as a secondary COC for Area 7.

Response: Agreed.

Action: Table 2-1 will be amended to include chromium as a secondary COC.

Commenting Organization: U.S. EPA

Commenter: Saric

Section #: 5.1

Pg #: 5-1

Line #: 28 through 31

Original Comment #: 3

Comment: The text states that several PAHs exceeded the hotspot criterion but no action was taken because there is no risk-based action to be taken for these ecological COCs. The text should be revised to provide more detail as to why additional soil was not excavated from this hotspot in CU 10.

Response: Agreed. Additional information regarding the evaluation of PAHs is warranted.

Action: The text will be amended to include the following additional information.

“After evaluating the level and extent of the BTV exceedances according to Section 2.1.4 of the SEP, it was determined that no further soil excavation is warranted. Instead the Restoration Design called for approximately one foot of clean soil to be added across the entire CU. The area is relatively level and has been re-seeded. Therefore, once the area had been restored, no potential for significant ecological exposure exists. The ecological COC exceedance is limited to one sample point and the extent of contamination (and subsequent exposure) is very limited. The averages of the Area 7 Silos Area as well as the surrounding areas relative to the ecological COCs are very safe and do not post any significant threat to ecological receptors. Even if there is a potential for exposure, the risk to ecological receptors appears to be very small. The PAH BTV exceedances are limited to one sampling point within one CU across the Silos Area. Pursuant to SEP, BTVs are not site-specific threshold values that must be met during remediation. Instead, BTVs are used to determine whether or not there is a need for further evaluation. The process established in Appendix C of the SEP calls for the use of certification data to compare representative concentrations against BTVs. Within the CU boundary the representative concentration for COECs would be the UCL on the estimated mean. These concentrations are all below the PAH BTVs. In the larger context across Area 7, the average PAH concentration from all CUs is also well below corresponding BTVs. For these reasons, no additional excavation is required to address the PAH exceedances in CU 10.”