



State of Ohio Environmental Protection Agency

Southwest District Office

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Bob Taft, Governor  
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October 22, 2004

Mr. William J. Taylor  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

**RE: DISAPPROVAL - RTC A9PIII AOL PLAN PART TWO**

Dear Mr. Taylor:

Ohio EPA has reviewed DOE's submittal on the, "Transmittal of Response to Ohio Environmental Protection Agency Comments on the Draft Area 9, Phase III Abandoned Outfall Line Excavation Plan Part Two" received on October 8, 2004. While Ohio EPA approves of these comment responses, another issue has been identified through field observations.

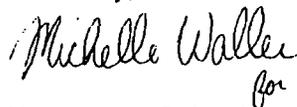
Ohio EPA's interpretation of the Excavation Plan was that the pilings at the river would be taken out, and only 'cut as necessary' as stated in the document to facilitate the removal. This follows the standard procedure of removal of all man made structures as part of remediation. It has come to our attention that this is not the approach DOE is planning to take. During a phone conversation questioning this issue, Ohio EPA was told that DOE is planning to only cut the pilings to facilitate the building of a ramp down to the river for debris removal, and leaving the rest of the pilings in place. No where in the plan is this explained, and it is certainly not addressed in either the CDL or PSP for Certification.

Either the pilings need to be removed, as is standard practice for remediation of an area, or a good argument presented to leave any of the pilings in place. If DOE would like to leave them in place, how does DOE plan on certifying the pilings for clean release?

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Should you have any questions, please contact Donna Bohannon, Michelle Waller or me.

Sincerely,

Handwritten signature of Michelle Waller in cursive script.

*for*  
Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA  
Mark Shupe, GeoTrans, Inc.  
Michelle Cullerton, Tetra Tech EM Inc.  
Ruth Vandergrift, ODH