



State of Ohio Environmental Protection Agency

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November 19, 2004

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

RE: DISAPPROVAL -PSP FOR PREDESIGN OF AREA 6 SUBAREA 1

Dear Mr. Taylor:

Ohio EPA has reviewed DOE's submittal on the, "Project Specific Plan for Predesign of Area 6 Subarea 1 (Supplement to 20300-PSP-0011) Rev 0" received on October 27, 2004. Enclosed are Ohio EPA's comments.

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

Sincerely,

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

**PSP FOR PREDESIGN OF
AREA 6 SUBAREA 1
(SUPPLEMENT TO 20300-PSP-0011)**

Comments:

1. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.2 Pg. #: 1-1 Line #: 23 Code: C
Original Comment #:

Comment: Ohio EPA understands the desire for as much information on an area as possible to design cleanup plans, but this document does not make any mention as to the Railyard, Locomotive Maintenance Building and vicinity still being an operational area. While investigating past contamination make's sense, how/when will investigating the possible impacts to the railyard during its operational phase be taken into consideration for further sampling once the railyard operations cease?

2. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.2 Pg. #: 1-1 Line #: 27-32 Code: C
Original Comment #:

Comment: Since Area 6 has been broken into several subareas, Ohio EPA would expect DOE to summarize all of the subareas into one excavation plan. Ohio EPA does not want to see the multiple excavation plans as in the excavation of A9P3 AOL. Breaking down areas into separate excavations has only contributed confusion, lengthened the projects timeframe and allowed for additional error.

3. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.1.2.3.2 Pg. #: 2-8 Line #: 10-13 Code: C
Original Comment #:

Comment: Sentences 10 through 13, on page 2-8, state that "above FRL material was likely removed," during an excavation surface scrape of the Railyard construction and further investigation is not required. Please provide verification that the above FRL material has been excavated from this area.

4. Commenting Organization: OEPA Commentor: OFFO
Section #: Figure 1-2 Pg. #: Line #: Code: C
Original Comment #:

Comment: Section 1.2 of this document refers to this map for the areas excluded from this PSP. The legend on this map also shows the areas 'excluded from this PSP', but that does not appear to be the case. This PSP references only A6 Subarea 1, but Subareas 2, 3 and 4, according to this map, should be included in this document as well. Please correct the map to show only Subarea 1 for this PSP.