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OhioEPA

State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6404

Bob Taft, Governor
Jennette Bradley, Lt. Governor
Christopher Jones, Director

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November 30, 2004

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

RE: DISAPPROVAL -ADDENDUM NO.1 TO THE IP FOR A2PII - SUBAREA 3 (INFRASTRUCTURE) SLA AND EWF

Dear Mr. Taylor:

Ohio EPA has reviewed DOE's submittal on the "Addendum No. 1 To The Implementation Plan For Area 2, Phase II - Subarea 3 (Infrastructure) Subcontractor Laydown Area and Equipment Wash Facility" (20450-PL-0001 Rev B Add 1), received on November 19, 2004. Enclosed are Ohio EPA's comments.

Should you have any questions, please contact Donna Bohannon 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

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ADDENDUM NO. 1 TO THE IP FOR A2PII SUBAREA 3 (INFRASTRUCTURE) SUBCONTRACTOR LAYDOWN AREA AND EQUIPMENT WASH FACILITY

1, Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:
Comment: Since A2P2 Subarea 3 has been broken into several subareas, Ohio EPA would expect DOE to summarize all of the subareas into one certification plan. Ohio EPA does not want to see the continuance of multiple plans as the A9P3 AOL project. Breaking down areas into separate excavations has only contributed to confusion and allows for additional error.

2. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.2 Pg. #: 2-2 Line #: 33 Code: C
Original Comment #:
Comment: This sentence states that the Subcontractor Laydown Area "continues to be used for subcontractor trailers," but does not clarify whether these trailers will be permanently removed prior to excavation.

3. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.3.2.2 Pg. #: 2-4 Line #: 7-11 Code: C
Original Comment #:
Comment: Additional detailed justification including reference to supporting data/studies should be provided to support not excavating the arsenic contamination. Such justification is especially important considering PCB contamination extends to at least 2.5'.

4. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.3.2.2 Pg. #: 2-4 Line #: 13-17 Code: C
Original Comment #:
Comment: The PCB contamination in this area is likely the result of the subcontractor staging transformers in the area. It also suggest that additional areas of localized PCB contamination may exist within the area. The sampling approach implemented was obviously insufficient to characterize such hotspots. Excavation should be conducted in such a manner as to facilitate observation of soil staining or discoloration that would then be investigated with additional pre-design sampling.

5. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.4 Pg. #: 2-4 Line #: Code: C
Original Comment #:
Comment: The section inaccurately references the same table for two separate types of information. The first sentence suggests Table 2-1 includes the preliminary COC list. The second sentence then states Table 2-1 includes the revised list of COCs. Whereas no reference is given for Table 2-2 that appears to give FRLs for only a portion of the "revised

COCs." This type of error and inconsistency in a document creates significant problems when DOE is requesting expedited reviews. Additional attention to document quality is necessary.

6. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.4 Pg. #: 2-4 Line #: Code: C
Original Comment #:
Comment: This section provides no justification for the reduction in COCs. Based upon Ohio EPA's review of the data package and the lack of justification within the text, all COCs from the pre-design PSP should be carried forward into certification.

7. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.5.2 Pg. #: 2-5 Line #: 4-11 Code: C
Original Comment #:
Comment: This paragraph states that the above-FRL conditions have been bound at 2.5 feet along the road however, two sample locations (Sub 1 and Sub 2) are restricted (due to the SWRB) if further bounding is necessary. Obviously additional bounding is needed in order to ensure the excavation and soon to be certified portions will not be recontaminated by residual PCBs. If as suggested in the text DOE does not intend to excavate outside the road bed, additional pre-design PCB sampling is necessary within the area between the road bed and the SWRB.

8. Commenting Organization: OEPA Commentor: OFFO
Section #: Figure 2-2 Pg. #: Line #: Code: C
Original Comment #:
Comment: This figure is misleading in that it suggests the area being addressed in the dcoument includes areas east of the roadbed. Whereas based upon discussions with FF, it is our understanding that the drawings in the Appendix actually define the scope of the document. In order to facilitate expedited reviews of documents, it is essential that DOE provide clear graphical representations of the work areas being addressed. Such clarity should not be relegated to the appendices of a document. With DOE's continued subdividing of project areas into smaller and smaller pieces, the need for clear figures and defined boundaries becomes even more important. Revise the figure and take precautions in future submittals to ensure accurate figures.

9. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.2 Pg. #: 3-3 Line #: 5-9 Code: C
Original Comment #:
Comment: This paragraph suggests the comingling of both <WAC and >WAC soil within a stockpile transfer area. This is not consistent with the approach laid out in the WAC attainment plans and presents high probability that soil will be inappropriately transferred

to the wrong location. Either create separate transfer points for the two types of soil or preferably ensure direct haul of one or both types of soil to disposal.

10. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.2 Pg. #: 3-3 Line #: 5-9 Code: C
Original Comment #:
Comment: The proposed use of a transfer point will create a new location requiring sampling for PCBs and other constituents in the future. Please include detail on how the requirement to assess this transfer area for PCBs will be carried forward in sampling documentation.

11. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.3 Pg. #: 3-3 Line #: Code: C
Original Comment #:
Comment: Backfilling in this area should be kept to a minimum. The excavation should be graded to provide a shallow ponding of water in the area. Inclusion of expected rough final grade drawings would be beneficial.