



State of Ohio Environmental Protection Agency

F-00600

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Bob Taft, Governor
Bruce Johnson, Lt. Governor
Joseph P. Koncelik, Director

FILE: 6446.7

April 22, 2005

Mr. William Taylor
US Department of Energy
Ohio Field Office
Fernald Closure Project
175 Tri County Parkway
Springdale, Ohio 45246

RE: COMMENTS - APPROACH FOR THE PHASED REDUCTION OF PROJECT RELATED AIR MONITORS IN THE IEMP

Mr. Taylor:

Ohio EPA has reviewed DOE's "Approach for the Phased Reduction of Project Related Air Monitors in the IEMP" submitted on March 23, 2005. Comments are attached.

Should you have any questions, please contact me at (937) 285-6466.

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
- Ken Alkema, Fluor Fernald

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Ohio EPA Comments on:

**APPROACH FOR THE PHASED REDUCTION OF PROJECT RELATED AIR
 MONITORS IN THE IEMP**

General Comments:

1. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: na Pg. #: na Line: na Code: E
 Original Comment #:
 Comment: In each section the text states "...when the criteria below has been met." Change the text to read, "...when *all* the criteria below have been met."

Specific Comments:

2. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: A.1.1 Pg. #: A.1-1 Line: na Code: C
 Original Comment #:
 Comment: Change the text in Criteria 1 to read, "The waste in the Waste Pits has been excavated, loaded into railcars, and removed from the site."

3. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: A.1.2 Pg. #: A.1-2 Line: na Code: C
 Original Comment #:
 Comment: Change the text in Criteria 1 to reflect that waste in the Waste Pits has been removed from the site and that all Silos waste material has been removed from the site.

4. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: A.1.2 Pg. #: A.1-2 Line: na Code: C
 Original Comment #:
 Comment: Change the text in Criteria 2 to state that the Waste Pit area footprint has been certified to meet FRLs.

5. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: A.2 Pg. #: A.1-3 Line: na Code: C
 Original Comment #:
 Comment: Change Criteria 1 to reflect that all waste from the Waste Pits and the Silos have been removed from the site.

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6. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: A.2 Pg. #: A.1-3 Line: na Code: C

Original Comment #:

Comment: Change Criteria 2 to read. "The Waste Pits project and Silos Project footprints have been certified to meet FRLs."