



State of Ohio Environmental Protection Agency

*W. Taylor*

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

**RE: COMMENTS - CDL AND CERTIFICATION PSP FOR AREA 4B - PART ONE**

Mr. Taylor:

Ohio EPA has received DOE's Transmittal Of The DRAFT Certification Design Letter and Certification Project Specific Plan For Area 4B - Part One dated July 7, 2005. Ohio EPA has reviewed this document and our comments are enclosed.

If there are any questions, please contact me or Donna Bohannon.

Sincerely,

*Thomas A. Schneider*

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

cc: Jim Saric, U.S. EPA  
Ken Alkema, FF  
Mark Shupe, HSI GeoTrans  
Michelle Cullerton, Tetra Tech Inc.

**CDL AND CERTIFICATION PSP FOR  
AREA 4B - PART ONE**

**COMMENTS:**

1. Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 3 Pg #: 3-5 Line #: Table 3-2 Code: C  
Comment: There are three ASCOCs included on this table where one above-FRL concentration was detected (Cesium-137, Strontium-90, & Thorium-230). Somehow DOE has determined that one detection confirms the fact that no further sampling will be conducted. In addition, neither a map or discussion is provided within the document for leaving these three ASCOCs off the list i.e., were these three locations previously bound and has all the contamination been excavated in these three locations (?). Based upon the insufficient justification these COCs should be included in the CDL.
  
2. Commenting Organization: Ohio EPA                      Commentor: DHWM  
Section #: 3 Pg #: 3-5 Line #: Table 3-2 Code: C  
Comment: This table lists the area-specific contaminants of concern (ASCOCs) for this Plan. Because this area is complicated, it is difficult to determine the analytes for any given CU. An additional table should be prepared which lists the COCs by CU.
  
3. Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 4 Pg #: 4-1 Line #: 26-31 Code: C  
Comment: The first bullet states that "each HWMU/UST footprint will form a distinct CU." This statement follows the SEP however, there appears to be some contradiction due to HWMU 28 having three separate "footprints."
  
4. Commenting Organization: Ohio EPA                      Commentor: DHWM  
Section #: 4.1.1 Pg #: 4-1 Line #: bottom of page Code: C  
Comment: The text states that "HWMU 28 [sic] is a noncontiguous CU that consists of three separate areas." The text does not make it clear why it was considered necessary to combine physically non-related areas into one CU. Nor is there a justification that twelve samples are adequate to satisfactorily characterize the CU. An underlying assumption when any data are manipulated statistically is that the data are subsets of the same distribution. No arguments are provided in the text to support combining data from three physically separated areas. Lacking a more thorough discussion, we suggest treating all three areas as distinct CUs.