



State of Ohio Environmental Protection Agency

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March 19, 2007

Mr. Johnny Reising
Fernald Project Director
EMCBC
250 East 5th St. Suite 500
Cincinnati, Ohio 45202

**RE: COMMENTS - RtCs TO OEPA COMMENTS AND THE DRAFT
CERTIFICATION RPT FOR AREA 6E**

Mr. Reising,

Ohio EPA has received DOE's "Transmittal Of Responses To Ohio Environmental Protection Agency Comments On The Draft Certification Report For Area 6E (20600-RP-0012) Rev 0," submitted on January 18, 2007. Ohio EPA has reviewed and disapproves DOE's responses to OEPA's comments, including the Certification Report. Ohio EPA anticipates that our comments will be addressed and included in the next revised Certification Report.

If there are any questions, please contact me.

Sincerely,

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

Cc: Jim Saric, US EPA
Michelle Cullerton, Tetra Tech Inc.
Mark Shupe, Geo Trans Inc

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**Response to DOE's Comments and the Draft
Certification Report For Area 6E**

Comments:

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: ES Pg #: ES-2 Line #: Code: C
Original Comment#: 1
Comment: In regards to DOE's Action Comment and to Ohio's Comment #1, DOE states that "the certification details are provided in Section 2.0." However, the Executive Summary refers to Section 3.0 for certification details. Change the text in the ES.

2. Comment: Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.5 Pg #: 1-2 Line #: Code: C
Original Comment#: 2
Comment: The fourth bullet in Section 1.5 states that there are 24 CUs in Area 6E however; Section 1.4 describes Area 6E as having 22 CUs. Change the text in Section 1.5 to coordinate with Section 1.4.

3. Comment: Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.0 Pg #: Figures Line #: Code: C
Original Comment#: 4
Comment: On Figure 2-1 it is difficult to know exactly where the High Leachate zone is located as it is currently marked. The rest of the Figures, 2-2, 2-3, 2-11 & 2-12 the High Leach area is easily recognized. Correct Figure 2-1.

4. Comment: Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.0/Appendix D Pg #: Line #: Code: C
Original Comment#: 19
Comment: Section 3.0 was not revised from Ohio EPA's last comment #19. Include a discussion in regards to Real Time – Phase 3 Figures (Appendix D) in the text of Section 3.0.

5. Comment: Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.2/CU18 Pg #: 5-3 Line #: Code: C
Original Comment#:
Comment: In the text's discussion regarding CU18, the "actual certification data" which demonstrates "95% UCL on the mean" that failed certification with a value of 1.806 pCi/g must be included into the paragraph. Recommend inserting the following..." a failing condition for radium-226 with a UCL of 1.806 pCi/g (See Appendix B)." Otherwise the section only presents preliminary data and not the actual results as Section 5.2 is intended.