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June 13, 2007

Ms Jane Powell
Fernald Site Mgr
DOE-LM-20.1
10995 Hamilton Cleves Hwy
Harrison, Ohio 45030

Ms Powell:

RE: COMMENTS - COMPLETED CHECKLIST FOR THE MARCH 2007 FERNALD SITE QUARTERLY INSPECTION

Ohio EPA has received DOE's transmittal on the "Completed Checklist for the March 2007 Fernald Site Quarterly Inspection," dated May 29, 2007. Ohio EPA has reviewed the report and our comments are enclosed. Ohio EPA looks forward to DOE's responses to the comments and how they will be incorporated into future inspections.

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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Ms Jane Powell

June 13, 2007

Page 3

was not mentioned in the report or shown on the checklist Buildings or infrastructure inspections need to be included in the report along with their findings.

b) One specific finding was at the Silo's Warehouse where the birds have made a home in the building's roof of the dock area. This issue was just starting to evolve at the time of the inspection and since, has become serious. This issue should have been addressed in the report and what type of action will be taken.

c) Additionally, the DO building appeared to be having the same bird invasion issue as the Warehouse. This information must be incorporated into the report and whether corrective actions have been put in place.

9. Commenting Organization: OEPA Commenter: OFFO

Section: General Pg #: Line #: Code: E

Original Comment#

Comment: Two main locations with erosion issues are not mentioned in the report or the shown on the checklist. These areas are the WPs and the surrounding slopes of the MDC culvert. How will these areas be addressed?

Specific Comments:

Inspection Report/Letter

10. Commenting Organization: OEPA Commenter: OFFO

Section: Last parag/bullets Pg #: 1 Line #: Code: C

Original Comment#

Comment: The "categories" indicating which items "need to be addressed" doesn't provide an idea on whether it's a finding that can wait to a later date to be acted upon or whether it needs immediate attention. Some sort of scale to mark the level of priority would be effective here.

11. Commenting Organization: OEPA Commenter: OFFO

Section: First parag Pg #: 2 Line #: Code: C

Original Comment#

Comment: It was stated in this short paragraph that there were a "few other findings" attached to the inspection checklist which were additional categories that did not fit into the existing categories. What are those "additional categories"? Should these categories be incorporated into future checklists?

12. Commenting Organization: OEPA Commenter: OFFO

Section: Secd & third parag Pg #: 2 Line #: Code: C

Original Comment#

Comment: a) This paragraph states that one method of signifying a corrective action will be noted on the inspection map as a "priority maintenance zone." Continue using this same idea to indicate other "priority zones" on the map in future inspections.

Ms Jane Powell

June 13, 2007

Page 4

b) In addition, a list of corrective actions should have been included in the report along with detail on how these items will be corrected. For example, in the third paragraph on page 2 the report explains that actions are underway in regards to knocking out invasive plant species. However, there is no indication as to which specific area of the site this plan will be put into place first, second, etc., and exactly how the invasives will be eradicated.

13. Commenting Organization: OEPA Commenter: OFFO
Section: Fourth parag Pg #: 2 Line #: Code: C
Original Comment#

Comment: This paragraph states that the unexpected debris will be characterized by Rad Control. Once debris is found on site and characterized (contaminated & non-contaminated) DOE should make a list of all debris found and provide the information in the inspection report.

Fernald Site Area Post-Closure Inspection Checklist

14. Commenting Organization: OEPA Commenter: OFFO
Section: 1/Disturb & Use of Fernald Pg #: 1 Line #: Code: C
Original Comment#

Comment: An additional category for buildings or infrastructure appears to be needed in the first section of the Inspection Checklist (added into the next version of the LMICP). During the second day of the inspection, a couple hours were spent checking the existing buildings at Fernald for vandalism, animal borrowing or disturbance, outside electrical issues, etc. The outcome of this was not provided in the report and needs to be incorporated.

15. Commenting Organization: OEPA Commenter: OFFO
Section: 1/Disturb & Use of Fernald Pg #: 1 Line #: 11 Code: C
Original Comment#

Comment: Repairing erosion issues are a large part of the corrective actions that need to take place at Fernald. Only by repairing these areas and getting vegetation established then progress can take place. Even though it is an "item" that's evaluated during the inspection and is currently listed on the checklist, erosion should be addressed in more detail in the report. Some type of mechanism is warranted to track, evaluate, and document repair progress of an eroding area over time.