



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGIONS 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 30 2006

REPLY TO THE ATTENTION OF:

Mr. Johnny W. Reising
United States Department of Energy
Fernald Closure Project
175 Tri-County Parkway
Springdale, Ohio 45246

SR-6J

RE: Area 6 Waste Pits
Certification Report

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) certification report for the Area 6 Waste Pits 1, 2, 3, Burn Pit, Clearwell and areas west and north of the Waste Pits. The document provides certification information and data to demonstrate the soil in this area meets the final remediation levels.

This report is consistent with other certification reports. However, the report indicates that certification units 10, 11, and 16 failed the statistical evaluation criteria and a risk assessment was conducted to further evaluate the results. U.S. EPA believes that the overall conclusion drawn in the report (primarily that the risk associated with radium-226 at concentrations that slightly exceed its final remediation level is within acceptable levels) is reasonable. This is especially true given the conservative assumptions used in the calculations and the fact that excavations at these certification units is down to about 18 feet below ground surface. However, the risk documentation to support the statements made in the report needs to be included. U.S. EPA has enclosed comments on this certification report reflecting the necessary information that needs to be provided as well as other discrepancies within the document.

Therefore, U.S. EPA disapproves the certification report for the Area 6 Waste Pits 1, 2, 3, Burn Pit, Clearwell and areas west and north of the Waste Pits. U.S. DOE must submit responses to comments and a revised document within thirty (30) days receipt of this letter.

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Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,



James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Con Murphy, Fluor Fernald
Frank Johnston, Fluor Fernald

actual exposure equations, exposure parameter values, toxicity factors, and EPCs used in the risk evaluations are not presented. The certification report should be revised to present (at least in summary format) this information. Sufficient information should be presented to allow an independent recalculation of the results.

Also, the certification report only presents summary results -- that is, only pathway-specific total hazard and risk results, along with overall total hazards and risks are presented for each CU. The certification report should be revised to present complete chemical- and pathway-specific results. This information is necessary to document the statements made in the text regarding which chemicals and pathways are driving specific total results.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA
Section #: 5.1
Original Specific Comment #: 1
Comment: The text states that CU A6WP-C1 consists of the footprint of the Clearwell. The text should be revised to state that CU A6WP-C13 consists of the footprint of the Clearwell.

Commentor: Saric
Page #: 5-2
Line #: 25

Commenting Organization: U.S. EPA
Section #: 5.1
Original Specific Comment #: 2
Comment: The text states that CU A6WP-09 passed all of the certification criteria. The text should be revised to state that CU A6WP-20 passed all of the certification criteria.

Commentor: Saric
Page #: 5-4
Line #: 19

Commenting Organization: U.S. EPA
Section #: 5.2
Original Specific Comment #: 3
Comment: Section 5.2 should be revised as necessary to provide sufficient documentation of the procedures used to conduct the risk evaluations and the risk results discussed in the text as presented in General Comment # 2.

Commentor: Saric
Pages #: 5-5 to 5-7
Line #: NA

Commenting Organization: U.S. EPA
Appendix #: A.2
Commentor: Saric
Page #: A.2.2
Line #: NA

