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

OCT 19 2006

REPLY TO THE ATTENTION OF: SR-6J

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

RE: Area 5 Administration Area and
West Parking Lot Draft CDL and PSP

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) draft Certification Design Letter (CDL) and Certification Project Specific Plan (PSP) for the Area 5 administration area and west parking lot. The document describes plans to demonstrate the soil in this area meets the final remediation levels.

The document proposed to use data from 2005 which is inconsistent with previous documents. U.S. EPA has enclosed comments on the document that must be addressed. Therefore, U.S. EPA disapproves the draft CDL and PSP for the Area 5 administration area and west parking lot. U.S. DOE must submit a revised document within thirty (30) days receipt of this letter addressing U.S. EPA's enclosed comments.

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

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Oct-19-2006 04:53pm From- T-087 P.002 F-872

TECHNICAL REVIEW COMMENTS ON
"CERTIFICATION DESIGN LETTER FOR AREA 5 ADMINISTRATION AREA AND WEST PARKING LOT"

FERNALD CLOSURE PROJECT

GENERAL COMMENT

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Not Applicable (NA) Page #: NA Lines #: NA
Original General Comment #: 1
Comment: The purpose of the document is to describe a plan to demonstrate that soil in the Area 5 Administration Area and West Parking Lot meet final remediation levels (FRL). The document proposes to use precertification data from November 2005 to demonstrate that the soil in the certification units (CU) meets FRLs and states that the area has been protected from impact since the time of the precertification sampling in November 2005. This sampling approach is not consistent with the Sitewide Excavation Plan which calls for precertification sampling followed by certification sampling. The Department of Energy (DOE) is asking the U.S. Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA) trust them that the area has not been contaminated in the last year. Using precertification data that is almost 1 year old for a 17-acre area is unacceptable, especially when the document states that the area has the potential for contamination from the Waste Pits and Silos material hauling operations. DOE should submit a revised certification design letter for review and approval by U.S. EPA and OEPA that includes collection of new soil samples before submittal of the certification report for the Area 5 Administration Area and West Parking Lot.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Executive Summary Page #: ES-1 Lines #: 32
Original Specific Comment #: 1
Comment: The text in the Executive Summary states that there are six CUs in the plan. However, the figures in the plan indicate that there area 13 CUs. The text should be revised to resolve this discrepancy.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 4.0 Page #: 4-1 Lines #: 17 through 21
Original Specific Comment #: 2
Comment: The text states that the approach for using precertification data for final certification is consistent with other approved certification efforts and cites the

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former Impacted Material Haul Road in Area 2, Phase II - Subarea 3. As stated in General Comment No. 1, this approach is unacceptable for a 17-acre area. DOE should submit a revised certification design letter for review and approval by U.S. EPA and OEPA that includes collection of new soil samples before submittal of the certification report for the Area 5 Administration Area and West Parking Lot.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 5.0 Page #: 5-1 Lines #: 6
Original Specific Comment #: 3
Comment: The schedule indicates that precertification sampling conducted in November 2005 will be used for final certification of the CUs in the area. As stated in General Comment No. 1, DOE should submit a revised certification design letter for review and approval by U.S. EPA and OEPA that includes collection of new soil samples before submittal of the certification report for the Area 5 Administration Area and West Parking Lot.

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