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Bob Taft, Governor
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May 19, 2006

Mr. Johnny Reising
US Department of Energy
Ohio Field Office
Fernald Closure Project
175 Tri County Parkway
Springdale, Ohio 45246

**RE: DISAPPROVAL- DRAFT CERTIFICATION REPORT FOR AREA 6 FPA AND
MDC**

Mr. Reising:

Ohio EPA has reviewed DOE's Transmittal of the "Draft Certification Report For Area 6 Former Production Area and Main Drainage Corridor Area (20810-PSP-0010) Rev A," dated March 30, 2006. Ohio EPA disapproves this document and comments are attached.

Should you have any questions, please contact Donna Bohannon or me.

Sincerely,

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

cc: Jim Saric, U.S. EPA
Mark Shupe, GeoTrans, Inc.
Michelle Cullerton, Tetra Tech EM Inc.

Mr. Johnny Reising
March 19, 2006
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inappropriate interpretation of the guidance. Archive samples from these two CUs should be analyzed for lead. Section 8.3 of the Ohio EPA Closure Plan Review Guidance (<http://www.epa.state.oh.us/dhwm/cprg.html>) specifically discusses lead contamination in soils. This guidance suggests that a soil lead concentration of less than 245 mg/kg meets risk-based standards for blood lead in children. Lacking a better suggestion from DOE, this concentration should be used in the statistical comparison.