



State of Ohio Environmental Protection Agency

*Rec'd 8/2/06*

Southwest District

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July 31, 2006

Mr. Johnny Reising  
US Dept of Energy  
Ohio Field Office  
Fernald Closure Project  
175 TriCounty Parkway  
Springdale, Ohio 45246

**RE: COMMENTS - CERTIFICATION REPORT FOR A6 GENERAL AREA EAST**

Mr. Reising:

Ohio EPA has reviewed DOE's "Transmittal of The Draft Certification Report for Area 6 General Area East (20600-RP-0007) Rev A," submitted June 30, 2006. Ohio EPA has reviewed this document and our comments are enclosed.

If there are any questions, please contact me or Donna Bohannon.

Sincerely,

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

cc: Jim Saric U.S. EPA  
Michelle Cullerton, Tetrattech

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Mr. Johnny Reising  
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4. Commenting Organization: Ohio EPA  
Section #: 3.2 Pg #: 3-1 Line #: 23-28  
Original Comment#:

Commentor: OFFO  
Code: C

Comment: V/FCN 20600-PSP-0016-69 is referenced here but not included within Appendix D as stated in the prior paragraph. Reference should be made to the fact that the incorporation of this V/FCN was completed within the CDL/PSP for the area.

5. Commenting Organization: Ohio EPA  
Section #: 3.2 Pg #: 3-1 Line #: 23-28  
Original Comment#:

Commentor: OFFO  
Code: C

Comment: Based upon discussions at our July 28<sup>th</sup> meeting regarding radium contamination from loadout operations within the area adjacent to CU18, it would seem necessary and appropriate to resample this CU for radium.

6. Commenting Organization: Ohio EPA  
Section #: 3.2 Pg #: 3-1 Line #: 30-31  
Original Comment#:

Commentor: OFFO  
Code: C

Comment: It is unclear from reading this how the tanker spill affected CU16 at subCU 11. The subCU appears to be up gradient of the spill location, yet the tanker spill is some how connected to the dropping of this subCU according to the text. Please clarify.

7. Commenting Organization: Ohio EPA  
Section #: 3.2 Pg #: 3-2 Line #:  
Original Comment#:

Commentor: OFFO  
Code: C

Comment: V/FCN 20600-PSP-0018-6 should have been submitted as a significant variance. The recontamination of an area undergoing certification is a major issue. It probably should have been submitted as an addendum to the CDL. Additionally, the variance required 10 samples and the text states 10 were collected, yet only 8 are reported in the document.

The proposed sampling in the variance is inadequate to characterize the potential recontamination. The area impacted by the spill should be sampled and evaluated as it's own CU with 16 samples from the entirety of the impacted area. Additionally, the COCs should include those from A6 East as well as those from SP7.

8. Commenting Organization: Ohio EPA  
Section #: Appendix C Pg #: Line #:  
Original Comment#:

Commentor: OFFO  
Code: C

Comment: The Trench CU 3 results list samples that were not collected for all the same COCs. Please explain this inconsistency, which suggests the CU does not represent a homogenous area and should be two CUs.