



State of Ohio Environmental Protection Agency

Rec'd 8-21-06

Southwest District

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August 18, 2006

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

RE: COMMENTS- DRAFT CERTIFICATION REPORT FOR A6 WP's 1, 2, & 3, THE BURN PIT, THE CLEARWELL, & THE AREAS WEST AND NORTH OF THE WP's

Mr. Reising:

Ohio EPA has reviewed DOE's "Transmittal of the Draft Certification Report For Area 6 Waste Pits 1, 2, and 3, The Burn Pit, The Clearwell, And Areas West and North Of The Waste Pits (20600-RP-0008), Rev A," submitted July 26, 2006. Based upon our review, Ohio EPA's comments are enclosed.

If there are any questions, please contact Donna Bohannon or me at (937) 285-6466.

Sincerely,

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

cc: Jim Saric U.S. EPA
Michelle Cullerton, Tetra Tech, EMI

Q:\ou5\A6\Area 6 Waste Pits and General Area\CertRptA6WP1,2,&3,BurnPit,Cirwel&West&NorthofWPs.Cmts1.wpd

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Original Comment#:

Comment: Figures 2-2 through 2-6 reference "Figure 4-3 thru 6" throughout however; there are no figures in section 4. Additionally, the figures reference draft on each which by now they should be final since they are what was implemented. Please correct.

6. Commenting Organization: Ohio EPA **Commentor:** OFFO

Section #: Table 2-1 **Pg #:** 5-5 **Line #:** **Code:** C

Original Comment#:

Comment: Specific Comment on Table 2-1 Area 6 ASCOC List page 2-5: This table should specify what environmental media (soil, groundwater, etc.) these FRL are applicable to

7. Commenting Organization: Ohio EPA **Commentor:** OFFO

Section #: 5.2 **Pg #:** 5-5 **Line #:** **Code:** C

Original Comment#:

Comment: This section should be greatly expanded to provide the reviewer more detail regarding the basic risk assessment assumptions such as exposure unit size. Please define the exposure unit and provide additional discussion to explain the rationale used to define and select the exposure unit.

8. Commenting Organization: Ohio EPA **Commentor:** OFFO

Section #: 5.2 **Pg #:** 5-5 **Line #:** **Code:** C

Original Comment#:

Comment: It's important to discuss the planned reuse of these waste units in order to determine the appropriate exposure unit and grouping of data for risk assessment purposes. Assuming that these areas will be reused as ponds, it is not clear if the reuse of these waste pits are as separate, individual ponds or as one big pond. This needs to be clarified in order to determine how to group the data in order to evaluate the results of certification sampling in a risk assessment exposure scenario.

9. Commenting Organization: Ohio EPA **Commentor:** OFFO

Section #: 5.2 **Pg #:** 5-5 **Line #:** **Code:** C

Original Comment#:

Comment: In light of the comment above, this is especially confusing since Table A.3.2 "*Summary of Residual Radionuclide Risk for Waste Pit Area*" (page A.3-1) provides risk estimates for the certification units separately (ie. CU 10, CU 11, and CU 16) and then also for Waste Pits. It is not clear what data results make up the data set for "Waste Pits" since it appears that CU 10 and CU 11 are within Waste Pit 3 and CU 16 is associated with Waste Pit 2. I assume that they combined all data from CU 10, 11 and 16 to use as the data set in the risk assessment for the "Waste Pits." The question then becomes whether or not this is appropriate based on reuse and exposure. I think that additional discussion in this report to explain the rationale for how they approached the calculations and grouping of data in the risk assessment could be one way to

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address this comment.

10. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.2 Pg #: 5-5 Line #: Code: C
Original Comment#:
Comment: In order to better understand the results of the risk assessment calculations, please explain if the exposure point concentrations (EPCs) were the maximum detected concentration or a 95% UCL?

11. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.2 Pg #: 5-5 Line #: Code: C
Original Comment#:
Comment: What is missing is a discussion of the results of the risk assessment and any uncertainties regarding the risk assessment. For instance, this risk assessment was based on soil results and a direct soil contact scenario. However, the reuse may be ponds and it is possible that the pond water may provide a level of shielding that is not considered in this risk assessment. If appropriate, this type of information should be discussed in the appropriate section (such as an uncertainty section) and may be helpful to put the results of the risk assessment into perspective.

12. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.2 Pg #: 5-5 Line #: Code: C
Original Comment#:
Comment: It is my understanding that for CU-10, only one sample location and sample result for radium-226 was greater than two times the FRL, even though the 95% UCL was less than the FRL. The risk assessment results from this area were within acceptable risk range as defined in the NCP. From a risk assessment standpoint, one sample location does not define an exposure unit and it is unlikely that a receptor would be exposed to only that one location; rather a receptor would likely be exposed to an area over time (and that area might consist of several sample results). Therefore, it is important to define the exposure unit for the defined receptor being evaluated and determine if the exposure unit is appropriate for that receptor. It is also important to include a discussion and uncertainty section after the risk assessment in order to present important points such as this and be able to put the risk assessment results into perspective.

13. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Table A.3.1 & A.3.2 Pg #: Line #: Code: C
Original Comment#:
Comment: Specific Comment on Table A.3.1 and Table A.3.2 - it is not clear what the difference is between these two tables. Does one table present the risks for chemicals and radionuclides combined and the other table just presents the risk estimates for radionuclides only? Please clarify this in the table headings/titles or as a footnote.