



State of Ohio Environmental Protection Agency

Rec'd 9-8-06

401 East Fifth Street  
Dayton, Ohio 45402-2911

Southwest District  
TELE: (937)285-6357 FAX: (937)285-6404  
www.epa.state.oh.us

Bob Taft, Governor  
Bruce Johnson, Lt. Governor  
Joseph P. Koncelik, Director

September 6, 2006

U. S. Department of Energy  
Ohio Field Office  
Fernald Closure Project  
175 Tri-County Parkway  
Springdale, Ohio 45246

**RE: DISAPPROVAL - ADDENDUM TO THE CERTIFICATION REPORT FOR AREA  
4B - PART ONE**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's August 30, 2006 submittal on the "Transmittal of the Addendum To The Certification Report For Area 4B - Part One." Based on our review, Ohio EPA disapproves the document. Ohio has the following comment on the document:

In DOE's cover letter, there is a conclusion regarding location A4B-C17-14 that "a comparison of data collected from this location prior to the excavation provided no value." This conclusion is absolutely wrong. In fact, a comparison of the data from certification and that following flooding clearly demonstrates that the flooding resulted in recontamination of a previously certified area and justified the regulators' demands for resampling and recertification of the flooded areas. The document should be revised to include the original data within Table 1 and a discussion of the fact that flooding resulted in recontamination should be included. This is an important lesson that should be clearly documented in this report and others regarding the importance of proper stormwater control and treatment capacity. Though it is not appropriate to consider the pre-excavation data within the certification calculations, it is definitely appropriate for the comparison table. The document should be revised accordingly.

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  
Michelle Cullerton, Tetra Tech, EMI