



State of Ohio Environmental Protection Agency

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October 30, 2006

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

RE: COMMENTS – RESPONSE TO OHIO ENVIRONMENTAL PROTECTION AGENCY REVIEW COMMENTS ON THE PROJECT COMPLETION REPORT, OPERABLE UNIT 4 COMPLEX SILOS 1 & 2 REMEDIATION FACILITY DECONTAMINATION AND DISMANTLEMENT

Mr. Reising:

Ohio EPA has reviewed DOE's transmittal of the "Response to Ohio Environmental protection Agency Review Comments on the Project Completion Report, Operable Unit 4 Complex Silos 1 & 2 Remediation Facility Decontamination and Dismantlement," received October 18, 2006. Ohio EPA submits the following statement:

The fact that the D&D effort at the FCP has come to an end does not relieve the DOE from the responsibility of accurately reporting the issues related to the D&D of the Silos 1 & 2 Remediation Facility. Specifically, the unplanned contamination of surface soils in the vicinity of the Silos area. The DOE response implies that the releases incurred during the Silos 1 & 2 Remediation Facility D&D, will be generically described in a post-closure database per DOE O 413.3. This is not an adequate response.

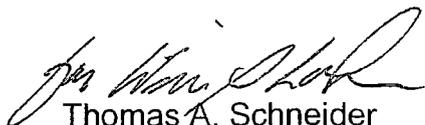
The response to comment also lists five bullets that directly affect the actual amount of resultant soil contamination from D&D activities. All five "bullets" are measurable quantities that should have been, not only, considered before and during D&D; but acted upon to minimize soil contamination.

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Appropriate controls may have been in place to prevent the spread of contamination however, without proper management and oversight of these controls, they will not perform as intended.

If you have any questions, contact Tom Schneider or Bill Lohner.

Sincerely,



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

cc: Jim Saric, US EPA
Michelle Cullerton, Tetra Tech EM, Inc.