



State of Ohio Environmental Protection Agency

Rec'd 11-21-06

Southwest District

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November 17, 2006

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

**RE: DISAPPROVAL - CERTIFICATION REPORT FOR VARIOUS AREAS OUTSIDE
OF THE HISTORICALLY RADIOLOGICALLY CONTROLLED AREA**

Mr. Reising:

Ohio EPA has reviewed DOE's "Transmittal of the Certification Report For Various Areas Outside of The Historically Radiologically Controlled Area (20500-RP-0006) Rev A," submitted October 24, 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
Mark Shupe, Geo Trans, Inc.

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**OHIO EPA'S COMMENTS ON THE CERTIFICATION RPT FOR
VARIOUS AREAS OUTSIDE OF THE HISTORICALLY
RADIOLOGICALLY CONTROLLED AREA**

Comments:

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: ES Pg #: ES-1 Line #: 14 Code: E
Original Comment #:
Comment: Reference is made to the Outside Areas being made up of "20" Group 1 CUs. Please make the correction to "21."
2. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: ES Pg #: ES-1 Line #: Code: C
Original Comment #:
Comment: V/FCN 20500-PSP-0015-1 was left out of this document. Please include it.
3. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: ES Pg #: ES-2 Line #: Code: C
Original Comment #:
Comment: The document states that DOE plans "to proceed with the final land use activities as outlined in the Natural Resource Restoration Plan (DOE2002)." What this document fails to point out is that the NRRP has not been finalized nor approved by the Agencies. Therefore, any restoration projects cannot yet be considered complete.
4. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: 2.0 Pg #: 2-7 Line #: NA Code: C
Original Comment#
Comment: Table 2-2 states Arsenic was not retained as an ASCOC, however Arsenic was as ASCOC for A7-C-AR and Utility Trench CU5.
5. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: 2.0 Pg #: Figs. Line #: NA Code: C
Original Comment#
Comment: Figures 2-6, 2-7, 2-8, 2-9, 2-10, 2-11, and 2-12 contain invalid figure references: Figures 4-5, 4-7, 4-8, 4-9, 4-10, 4-11, 4-12, and 11 do not exist in this document.
6. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.2.1 Pg #: 2-3 Line #: 4-8 Code: C
Original Comment #:
Comment: The document states that samples were previously collected, under another document, to represent the certification samples for the Communications Hut. However, the data is not included in the certification report. In DOE's RtC's to Ohio EPA on June 5, 2006, the result of certification sampling was to be added to the document as Appendix F. Please include this appendix.

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7. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.2.1 Pg #: 2-3 Line #: 4-8 Code: C

Original Comment #:

Comment: The document does not mention whether there were any real-time scans or "additional" physical samples collected "in" the parking lot of the Security Trailer Area?

8. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: 2.2.2 Pg #: 2-3 Line #: 34-35 Code: C

Original Comment#

Comment: The text states archive samples "were not collected in any CU with the exception of CU 31". No CU 31 exists in the Outside Areas covered by this report.

9. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: Ap. A.1 Pg #: 16, 17, & 21 Line #: NA Code: C

Original Comment#

Comment: Est. Mean values calculated from data do not match Est. Mean values shown in Statistics Tables for A7-C-AR (Arsenic Est. Mean = 7.26, table shows 7.02), A7SAR-C01 (Radium-226 Est. Mean = 1.20, table shows 1.14), and A7SAR-C05 (Beryllium Est. Mean = 0.96, table shows 0.95).

10. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: Ap. A.1 Pg #: 15, 16, & 20 Line #: NA Code: C

Original Comment#

Comment: Maximum values shown in Statistics Tables are incorrect for A7-C-AR (Cesium-137 Max. = 0.0605 U, table shows 0.0605; Technetium-99 Max. = 0.844 U, table shows 0.844; Dieldrin Max. = 1.6 U, table shows 1.6; and Lead Max. = 20.7, table shows 18.3) and A7SAR-C04 (Radium-226 Max. = 1.44, table shows 1.31).