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December 13, 2006

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

RE: DISAPPROVAL – DRAFT CERTIFICATION REPORT FOR THE FSWL, SP7 FOOTPRINT, SWM POND AND RAILYARD DRAINAGE BASIN

Mr. Reising,

Ohio EPA has received DOE's "Transmittal Of The Certification Report For The Former Solid Waste Landfill, Soil Pile 7 Footprint, Stormwater Management Pond And Railyard Drainage Basin Area (20600-RP-0013), Draft Revision A, submitted on October 30, 2006. Ohio EPA has reviewed and disapproves of this document. Our comments are enclosed.

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

Sincerely,

Donna Bohannon for

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

Cc: Jim Saric, US EPA
Michelle Cullerton, Tetra Tech Inc.
Mark Shupe, Geo Trans Inc

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OHIO EPA'S COMMENTS ON THE CERTIFICATION REPORT FOR THE FSWL, SP7 FOOTPRINT, SWM POND AND RAILYARD DRAINAGE BASIN AREA

Comments:

1. Commenting Organization: OEPA Commenter: OFFO
Section #: General Pg #: Line #: Code: C
Original Comment#
Comment: Ohio EPA finds it unacceptable that DOE has inserted two new areas into this certification report, the Lime Scale Pit and the Dump Pit, and that they were never discussed previous to this report. In addition, DOE conducted the sampling and excavation through "nonsignificant" variances when the variances should have been significant. These two areas and the variances should have been brought to the attention of the Agencies, especially considering the scale and depth of the pits and the excavation involved.

The Lime Scale Pit and the Dump Pit need to be added into the document as part of the certification reports scope. A discussion needs to be included that will cover the process and history of these two pits, and the information must be presented in the Executive Summary, Scope description and Certification Design. In addition, the Lime Scale Pit and Dump Pit need to be on Figures 1-2, 2-1, and a separate figure showing sample locations. The also should be shown on any other figures that are appropriate.

2. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: List of figures Pg #: ii Line #: NA Code: C
Original Comment#
Comment: Incorrect figure citation, Figure 1-3 should be "FCP Controlled Certification\ Map", not "Topography".

3. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: 1.5 Pg #: 1-2 Line #: 29 Code: C
Original Comment#
Comment: Incorrect citation, correct citations appear in List of Appendices on page ii.

4. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: 2.0 Pg #: figs Line #: NA Code: C
Original Comment#
Comment: Sample location symbol is missing on Figure 2-2 and Figure 2-3 for A6 SWL-C03 13 and A6-SWMP-C01-16D, respectively.

5. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: 2.0 Pg #: Table 2-2 Line #: NA Code: C
Original Comment#
Comment: On page 2-1, Line 4, the text indicates that Table 2-2 shows the CUs where Each ASCOC is retained. Table 2-2 does not, however, include this information.

6. Commenting Organization: OEPA Commenter: OFFO
Section #: 3.1.3 Pg #: 3-3 Line #: 16-21 Code: C
Original Comment#
Comment: DOE hasn't provided enough information regarding the precertification and certification activities regarding the SWM Pond. Include additional detail in this section relating to the overview of field activities conducted in the SWM Pond.

7. Commenting Organization: OEPA Commenter: OFFO
Section #: 3.1.4 Pg #: 3-3 Line #: 23-28 Code: C
Original Comment#
Comment: DOE hasn't provided enough information regarding the precertification and certification activities regarding the Railyard Drainage Basin Area. Include additional detail in this section relating to the overview of field activities conducted in the Railyard Drainage Basin Area.

8. Commenting Organization: OEPA Commenter: OFFO
Section #: 3.1.4 Pg #: 3-3 Line #: Code: C
Original Comment#
Comment: This Section on "Changes to Scope of Work" needs clarification. Please provide the following information in the text.
A) Lines: 1-4. Please include the FRL for benzo(a)pyrene.
B) Lines: 6-10 and 12-17. Please mention the last sample result discussed or state that the results were below FRL, and reference the data table in the Appendices.
C) Lines: 19-22. Please provide the sample results for the last three samples discussed or state that the data was below FRL.
D) Lines: 24-27. The three sample results for the analysis of Aroclor-1254 should be in the text or state that the data was below FRL.

Including the above information will let the reader know all contamination was removed and sample results showed the area to be below the FRL.

9. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: 3.2 Pg #: 3-4 Line #: 24-27 Code: C
Original Comment#
Comment: V/FCN 20600-PSP-0021-06 is missing from Appendix B.

10. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: 5.1 Pg #: 5-1 Line #: 29 Code: C
Original Comment#
Comment: Incomplete sentence: "While these analytes passed statistical analysis," is a fragment. Include the rest of the information regarding this CU.

11. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: Ap. A.2 Pg #: NA Line #: NA Code: C
Original Comment#
Comment: On page 3-2, Line 34, the text indicates that Appendix A, Attachment A.2

Include the data for Aroclor-1254 samples collected following hotspot excavation (A6SP7-T-12 and -13). These data are missing from Appendix A, Attachment A.2.

12. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: Ap. C.2 Pg #: C.2-34 Line #: NA Code: C
Original Comment#
Comment: Per Section 3.1.2, page 3-3, line 7-9, only the highest value for the Lime Scale Pit should be included in table for A6-SP7-C06 Thorium-228 and Thorium-232. Values included for A6SP7-LSP-PC-18 and A6SP7-LSP-PC-19 should be removed.

13. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: Ap. C.2 Pg #: C.2-29-33 Line #: NA Code: C
Original Comment#
Comment: Per Section 3.1.2, page 3-3, line 7-9, the highest post-excavation sample result for each analyte from the dump pit was included in the statistical analysis for A6 SP7-C05. Values used in Statistics Tables for Dump Pit in A6-SP7-C05 are, however, incorrect (not maximum values from Lime Scale Pit - Dump Pit Precertification table) for Radium-226 (1.65867 at A6SP7-DP-PC-11 vs. 1.34 in table), Uranium, Total (161 J at A6SP7-DP-PC-18 vs. 69.1 in table), Arsenic (10.4 at A6SP7-DP-PC-6 vs. 8.4 in table), and Silver (0.09 J at A6SP7 DP-PC-6 Vs. 0.9 J).

14. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: Ap. C.2 Pg #: C.2-34-37 Line #: NA Code: C
Original Comment#
Comment: Per Section 3.1.2, page 3-3, line 7-9, the highest post-excavation sample result for each analyte from the lime scale pit was included in the statistical analysis for A6-SP7-C05. Values used in Statistics Tables for Line Scale Pit in A6-SP7-C06 are, however, incorrect (not maximum values from Lime Scale Pit - Dump Pit Precertification table) for Cesium-137 (0.0353 at A6SP7-LSP-PC-10 vs. 0.162 in table), Arsenic (7.1 at A6SP7-LSP-PC-9 vs. 6.7 in table), Dibenzo(a,h)anthracene (42 U at A6SP7-LSP-PC-7 vs. 41.2 U in table).

15. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: Ap. C.2 Pg #: C.2-29 Line #: NA Code: C
Original Comment#
Comment: Per Section 3.1.2, page 3-3, line 7-9, the highest post-excavation sample result for Uranium, Total from the dump pit is to be included in the statistical analysis for A6-SP7-C05. For A6-SP7-C05, the maximum sample result is 161 mg/kg at A6SP7-DP-PC-18. The statistics table for this CU should be corrected with this sample result in accordance with the text. Because the maximum value > FRL, the statistical evaluation should be performed and the table appropriately updated.