

7216



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

November 25, 2009

Ms Jane Powell
Fernald Preserve Manager
DOE-LM-20.1
10995 Hamilton Cleves Hwy
Harrison, Ohio 45030

**RE: COMMENTS - 2010 COMPREHENSIVE LEGACY MANAGEMENT AND
INSTITUTIONAL CONTROLS PLAN, REVISION 4, DRAFT (September 2009)**

Ms Powell:

Ohio EPA has received DOE's Transmittal of the 2010 Comprehensive Legacy Management and Institutional Controls Plan, Revision 4, Draft, dated September 30, 2009. Ohio EPA has reviewed the document and our comments are enclosed.

If there are any questions, please contact me.

Sincerely,

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

Cc: Tim Fischer, US EPA
Frank Johnston, Stoller
David Devault, UF&W Services

\\offo\femp\Fernald Preserve Post Closure\Institutional Controls\September 2009&2010LMIC\2010Sept09Rev4DrftCmts1.doc

**OHIO EPA COMMENTS ON THE
2010 CLMIC, REV 4, DRAFT,
SEPTEMBER 2009**

GENERAL COMMENTS:

1. Commenting Organization: Ohio EPA

Section #: na Pg #: na

Comment: Volume I continually refers to the FRLs. A list of the FRLs for the primary COCs on-site should be included in a table or as an attachment.

2. Commenting Organization: Ohio EPA

Section #: General Pg #: Line #: na

Comment: Past experience with the Significant Changes Summary Sheet has always included more information on technical issues than with more recent Changes Summary. Some changes lack necessary details. Many significant changes are not included in the summary.

3. Commenting Organization: Ohio EPA

Section #: General Pg #: Line #: na

Comment: The track changes need to be consistent. Not all "strike out" text was handled the same way. The different authors of the different sections should use a common method which allows the reviewer to easily recognize changes to the document.

Summary Changes

4. Commenting Organization: Ohio EPA

Section: Attachment B - PCCIP/Section 4 Pg#: 2 Line#:

Comment: The description of the change and the specific change cannot be found in this document. Please correct.

5. Commenting Organization: OEPA

Section #: Attachment B/Appendix B - PSP for OSDF Pg #: 2 Line #: Section4

Comment: The correction/updated information noted on the Summary Changes are not in the document. In checking two places in the document, one was Volume II/Appendix B and the other was Attachment B/Appendix B the correction was not found. Please clarify in the Summary Changes and in the text where this updated information is located.

Volume I

6. Commenting Organization: Ohio EPA

Section #: 1.1 Pg #: 1-2 Line #: na

Comment: An entire paragraph was omitted without notification or 'strike through' editing. This and all changes to the LMICP should be notified with either blue strikethrough or red addition editing marks. The paragraph should remain as written in 2008 LMICP. The categorization of LM activities at Fernald is an important topic that should remain in this section.

7. Commenting Organization: Ohio EPA

Section #: 2.2.3 Pg #: 2-3

Comment: Reword the second sentence of the first paragraph. The wording implies that all contaminated soils were excavated and that the excavated soils were certified. Ohio EPA recommends the following wording: "Contaminated soil detected above FRLs has been excavated and appropriately disposed. Remaining soils have been certified to meet final remediation levels (with the exception of certain areas associated with utility corridors and groundwater infrastructure)."

8. Commenting Organization: Ohio EPA

Section #: 2.3.1 Pg #: 2-4

Comment: A few additional sentences describing the remediation of OU 4 are recommended. For example, stating that Silos 1 & 2 were treated and containerized in specially designed canisters, sent to interim storage in Texas, and finally buried in fall 2009. Additional clarification on the treatment and disposal of Silo 3 waste should also be included.

9. Commenting Organization: Ohio EPA

Section #: 2.3.1 Pg #: 2-4

Comment: The last paragraph on this page and throughout the entire CLMIPC, includes a sentence that states, "Soil certification processes were performed to ensure that excavation has removed all impacted material..." The certification process does not ensure that all impacted material has been removed. The certification process ensures that the average residual contamination in a certification meets FRLs. Please revise the text.

10. Commenting Organization: Ohio EPA

Section #: 2.3.1 Pg #: 2-4 Line #: na

Comment: In this section and throughout the entire CLMIPC, remove the phrase, "removed all impacted material". This is simply not true. Use a phrase that indicates soils detected above FRLs have been removed.

11. Commenting Organization: Ohio EPA

Section #: 2.4.4 Pg #: 2-11 Line #: na

Comment: Reinsert the words "...at this time" at the end of the paragraph about soil certification of subgrade utility corridors. Again these words were omitted without redline.

12. Commenting Organization: Ohio EPA

Section: 2.4.4/Figure 2-3 Pg#: 2-10 & 2-11 Line#:

Comment: The text discusses uncertified areas at the Fernald site, including soils within the footprints of the facilities left on site. Not all infrastructure discussed in the text are included on the Figure. Please include all facilities on Figure 2-3.

13. Commenting Organization: Ohio EPA
Section #: 2.4.5 Pg #: 2-11 Line #: na
Comment: Reinsert the sentence, "The center serves to maintain awareness of site history and conditions, and help prevent unsafe disturbances and uses of the site." Again this sentence was deleted without appropriate redline strikeout to indicate a change.

14. Commenting Organization: Ohio EPA
Section #: 3.0 Pg #: 3-1 Line #: na
Comment: Reinsert the sentence, "The IC Plan is included as Volume II of this LMICP." Again text was deleted and added without the appropriate strikethrough or highlighting. Please indicate where all changes (major and minor) were made throughout the document through a consistent strikethrough/redline editing process.

15. Commenting Organization: Ohio EPA
Section #: 3.0 Pg #: 3-1
Comment: A brief summary of the requirements for DOE as a result of the NRDA settlement with the state of Ohio should also be discussed in this section.

Volume II

16. Commenting Organization: Ohio EPA
Section #: General Pg #: na
Comment: Each attachment and section provides redundant descriptions of the site and the OSDF. Consider putting these descriptions at the beginning of the volume and referencing the description in subsequent sections of the document.

17. Commenting Organization: Ohio EPA
Section #: 1.0 Pg #: 1-1
Comment: The "bullet" for OU4 needs to be updated stating waste placement at WCS in fall 2009.

18. Commenting Organization: Ohio EPA
Section #: 1.0 Pg #: 1-2 Line #: na
Comment: In the second last paragraph of section 1.0, revise the last sentence to read, "These include the Visitors Center (former silos warehouse), CAWWT..." The Visitors Center is referred to as the warehouse in all authorizing documents for its continued existence; the reference to warehouse should be maintained.

19. Commenting Organization: Ohio EPA
Section: Table 1-1, Table 3.1 & Section 3.1.1 Pg#: Table 1-1/Item 3/Line#: Frequency
Comment: Item 3 on Table 1-1, Table 3.1, and Section 3.1.1 describes routine site inspections as being conducted "Annually". Clarification is needed to explain the inspections are done on a quarterly basis, but the entire site is inspected once a year through the quarterly inspections. In reading the text, the information leads the reviewer to think that the site is inspected just once a year. Please clarify the text in Table 1-1.

20. Commenting Organization: Ohio EPA

Section #: Tables 1-1 & 1-2 Pg #: 1-8, 9

Comment: In the "Government Controls" row it should be noted that a result of the NRDA settlement with the State of Ohio an environmental covenant was filed and is a control on the disturbance and use of the Fernald Preserve and OSDF.

21. Commenting Organization: Ohio EPA

Section #: 2.1.1 Pg #: 2-2

Comment: The last sentence/paragraph in this section states that land use restrictions may be modified or terminated in consultation with EPA and OEPA. Land use restrictions may be modified or terminated only with the approval of USEPA and Ohio EPA.

22. Commenting Organization: Ohio EPA

Section #: 3.1.2 Pg #: 3-3

Comment: It should be noted that as long as there is a discharge regardless of whether it is the GMR or other surface water, an NPDES permit will be needed.

23. Commenting Organization: Ohio EPA

Section #: 3.2.1 Pg #: 3-8 Line #: na

Comment: Was vegetative cover data collected for cell cap 8? Or will this monitoring take place in 2010?

24. Commenting Organization: Ohio EPA

Section #: 5.2.2 Pg #: 5-4 Line #:

Comment: This document states in several places that LM will meet at least annually for public meetings. At the October 2009 LM public meeting, citizens requested a public meeting in the spring. LM and Stoller should accommodate citizen's requests. Elsewhere in the document the important historical contribution of citizen's involvement is noted. Community involvement is an important element of long-term stewardship and will ultimately impact the effectiveness of the cleanup remedy at Fernald.

LM and Stoller's primary responsibility at Fernald is to continue protecting and maintaining the remedy. This includes informing the public of maintenance progress, inspection results and any other issues affecting the remedy. If money and staff time are a concern, in regards to meeting preparation, LM should be able to provide a meeting with a scaled down format that would still provide the information the public is wanting.

Attachment A - Operations and Maintenance Master Plan for Aquifer Restoration and Wastewater Treatment

25. Commenting Organization: Ohio EPA

Section #: 5.1 Pg #: 5-1

Comment: The Fernald Preserve is not operating the CAWWT ALARA. CAWWT is operated minimally to meet discharge limits. Revise the text. The first sentence of section 5.3.1 is a more accurate description of how the CAWWT is operated.

26. Commenting Organization: Ohio EPA

Section #: 6.3.2 Pg #: 6-14

Comment: The fact that the CAWWT is only operated approximately 5% of the time should be mentioned in this paragraph because there should only be minimal maintenance outages since the CAWWT is not operating often.

Attachment B - Post-Closure Care and Inspection Plan

27. Commenting Organization: OEPA

Section #: Table 8-1/Footnotes Pg #: 8-2 Line #: Second footnote

Comment: The second footnote refers to Section 10.0. It is somewhat unclear as to the exact Section 10.0. If the reference is referring to Section 10.0 of the PCCIP, please indicate as such.

28. Commenting Organization: Ohio EPA

Section #: 3.5 Pg #: 3-7

Comment: The last paragraph on this page (continuing on the next page) gives a description of how photographs are to be taken during OSDF inspections. As an active participant during these inspections, GPS is not routinely used by all inspectors when taking photographs. The paragraph should be revised to reflect this fact.

29. Commenting Organization: Ohio EPA

Section #: 6.2.1.2 Pg #: 6-2

Comment: The second paragraph states the requirements for inspectors of the OSDF. This information should be provided in the subsequent inspection reports, stating who the chief inspector is and his/her credentials. The same should apply to assistant inspectors.

30. Commenting Organization: Ohio EPA

Section #: 6.2.1.4 Pg #: 6-2

Comment: A GPS should be included in the list of inspection equipment.

31. Commenting Organization: Ohio EPA

Section #: Table 7-1 Pg #: 7-2

Comment: Large trees and/or shrubs are not permitted to be on the cover of the OSDF, radiological analysis is not appropriate. Simply state that large trees and shrubs should not establish themselves; and, if present, will be removed.

32. Commenting Organization: Ohio EPA

Section #: Table 8-3 Pg #: 8-4

Comment: The row "Grade control structures", "Conditions" should have the bullet "Clogging by sediment or debris" reworded to read "Clogging by sediment, debris, or vegetation."

33. Commenting Organization: Ohio EPA

Section #: 8.3.2 Pg #: 8-4

Comment: The first partial paragraph states that mowing will not occur if it will have an adverse effect on the vegetation. Optimally, mowing should also not occur if it will adversely affect the nesting of grassland birds. Revise text accordingly.

Attachment C - Groundwater/Leak Detection and Leachate Monitoring Plan

34. Commenting Organization: OEPA

Section #: N/A Pg #: iii Line #: N/A

Comment: A definition of the acronym "RLCS" should be added to this list.

35. Commenting Organization: Ohio EPA

Section #: 1.0 Pg #: 1-1

Comment: The 4th paragraph states, "A water quality change in either an HTW or GMA well can only be attributed to a potential leak from a cell in the OSDF if it is accompanied by a corresponding action flow rate in the LDS of that cell." Ohio EPA uses water quality parameters as the primary tool for leak detection in landfills. Reword the sentence indicate that it is unlikely that a leak would occur without a corresponding action flow rate, but significant changes in either water quality or flow rates will be investigated.

36. Commenting Organization: OEPA

Section #: 1.1 Pg #: 1-1

Comment: Since it is possible to have a leak without an accompanying action flow rate in the LDS, revise the sentence that reads "A water quality change in either an HTW or GMA well can only be attributed to a potential leak from a cell in the OSDF if it is accompanied by a corresponding action flow rate in the LDS of that cell." to "Assuming that no short circuiting is occurring (i.e., presence of a fully penetrating breach in the liner system up-stream of the leachate collection point), a water quality change in either an HTW or GMA well can only be attributed to a potential leak from a cell in the OSDF if it is accompanied by a corresponding action flow rate in the LDS of that cell."

37. Commenting Organization: Ohio EPA

Section #: 1.1 Pg #: 1-3

Comment: The 4th paragraph describes the action leakage rate that is necessary to provide enough head pressure to produce a leak. This design specification requires that the OSDF is performing as designed, i.e. LCS and LDS are working properly and there are no construction design flaws other than a breach of the primary liner.

38. Commenting Organization: Ohio EPA

Section #: 1.2 Pg #: 1-5

Comment: Last paragraph, 2nd bullet, states that water quality change must be accompanied by a corresponding action leakage rate. Ohio EPA rules use water quality measurements as the primary tool for leak detection. Revise text accordingly

39. Commenting Organization: Ohio EPA

Section #: 2.4 Pg #: 2-6

Comment: In the 4th and 5th lines underneath Table 2-1 change the sentence to read, "...it is ~~not unexpected~~ expected that contaminant concentrations in perched groundwater would increase change."

40. Commenting Organization: OEPA

Section #: 3 Pg #: 1-3 Line #: 31

Comment: Since it is possible to have a leak without an accompanying increase in hydraulic head in the facility, revise the phrase that reads "in order to have conditions needed" to "in order to have one set of conditions needed."

41. Commenting Organization: OEPA

Section #: 3 Pg #: 1-5 Line #: 37

Comment: Since it is possible to have a leak without an accompanying action leakage rate, revise "A water quality change beneath the facility needs to be accompanied by a corresponding action leakage rate in the LDS in order for the change to be attributed to a potential leak from the facility. Unless a water quality change in an HTW or GMA well is accompanied by a corresponding action leakage rate in the LDS, the change will not be attributed to a potential leak from the facility." to "A water quality change beneath the facility may be accompanied by a corresponding action leakage rate in the LDS. Review of flow volume data will therefore accompany the review of water quality data."

42. Commenting Organization: OEPA

Section #: 3 Pg #: 3-4 Line #: 33

Comment: Since cell hydraulic conditions do not intrinsically circumvent any consideration of cell groundwater quality data, revise the third bullet to read "Fluid volume is a key monitoring parameter to indicate the potential for leachate migration, and will be used to aid the evaluation of water quality data

43. Commenting Organization: Ohio EPA

Section #: 3.2.1.4 Pg #: 3-7

Comment: Regarding the last sentence on this page, the Ohio EPA requested quarterly sampling and it should not be terminated at the end of 2010. Ohio EPA suggests that quarterly sampling and other parameter frequencies be reevaluated annually.

44. Commenting Organization: Ohio EPA

Section #: 3.2.2 Pg #: 3-8

Comment: From this and subsequent sections, delete the sentence "DOE considers this additional sampling for Appendix I and PCB parameters as exceeding the requirements of Ohio Solid Waste regulations because an alternate parameter list had been approved for the facility." The Director of the Ohio EPA has the ultimate authority for determining the appropriateness of an alternate parameter list, and; as previously stated, the concentrations in the horizons of OSDF can be expected to change, and so should the parameter list.

45. Commenting Organization: OEPA

Section #: 4 Pg #: 4-1 Line #: 29

Comment: Since it is possible to have a leak without an accompanying increase in hydraulic head in the facility, revise the sentence that reads "The key to a plausible potential leak determination is the presence of adequate hydraulic head within a cell of the OSDF (i.e., action leakage rate in the leak detection system [LDS])" to read "One indicator of a possible leak is the presence of adequate hydraulic head within a cell of the OSDF (i.e., action leakage rate in the leak detection system [LDS])."

46. Commenting Organization: OEPA

Section #: 4 Pg #: 4-1 Line #: 31

Comment: Since it is possible to have a leak without an accompanying action leakage rate; revise "However, due to preexisting background contaminant complications discussed in Section 2, the water quality of the monitored horizon is a secondary criterion that has merit if sufficient head exists to drive leachate through the liner. Unless a water quality change in an HTW or GMA well is accompanied by a corresponding action leakage flow rate in the LDS, the change will not be attributed to a potential leak from a cell in the OSDF." to "In leak detection assessments, water quality data will be evaluated in concert with preexisting contamination data and LDS flow data."

47. Commenting Organization: OEPA

Section #: 4 Pg #: 4-4 Line #: 40

Comment: Add the following text at the end of Paragraph 5 on this page. "If the breach fully compromised the liner system, leachate could readily migrate downward if a pathway (such as fractures in the till or a seam of coarse grained material) was present especially since such contamination would migrate under gravity and capillary forces since the base of the OSDF is above the perched water table in the till.

48. Commenting Organization: OEPA

Section #: 4 Pg #: 4-5 Line #: 7

Comment: For clarification, revise "it is the flow rate that corresponds to a hydraulic head within the facility capable of driving fluid through a liner breach." to "it is the flow rate that corresponds to a hydraulic head within the facility capable of driving fluid through a liner breach, if the breach occurs at the penetration box."

49. Commenting Organization: Ohio EPA

Section #: 4.4.2.1 Pg #: 4-13

Comment: The last sentence in the 3rd paragraph states that Ohio EPA receives monthly reports of LCS/LDS flow rates. This is not currently happening. Begin sending monthly reports.

50. Commenting Organization: OEPA

Section #: 4 Pg #: 4-13 Line #: 8 and subsequent lines

Comment: Since it is possible to have a leak without an accompanying increase in hydraulic head in the facility, revise the sentence that reads "The key to a plausible potential leak determination is the presence of adequate hydraulic head within a cell of the OSDF (i.e., action leakage rate in the LDS)" to read "One indicator of a possible leak is the presence of adequate hydraulic head within a cell of the OSDF (i.e., action leakage rate in the LDS)."

51. Commenting Organization: Ohio EPA

Section #: 4.5 Pg #: 4-15

Comment: The last sentence in the last paragraph needs to be revised to reflect that water quality and leakage rates will be evaluated independently to determine if a leak may have occurred.

52. Commenting Organization: Ohio EPA

Section #: 5.1 Pg #: 5-2

Comment: Any changes to the leachate treatment system on site will have to be approved by both USEPA and Ohio EPA.

53. Commenting Organization: OEPA

Section #: 6 Pg #: 6-1 Line #: 15

Comment: Revise this bullet to read "Identify any new detects in the LCS and provide the results of the statistical analysis following the process described in Appendix E, Section 4.0."

54. Commenting Organization: Ohio EPA

Section #: 6.1 Pg #: 6-1

Comment: Previous sections in the LMICP indicate that leachate collection volumes will be reported monthly. Revise text to reflect monthly reporting.

55. Commenting Organization: Ohio EPA

Section #: 6.1 Pg #: 6-1

Comment: Water quality data should also be evaluated to prepare tri-linear diagrams (Piper & Stiff) to better understand water quality data.

Attachment C/Appendix B - Project Specific Plan for the OSDF Monitoring Program

56. Commenting Organization: OEPA

Section #: App. B Pg #: 6 Line #: NA

Comment: Revise Table 2 title to "2010 Quarterly LCS, LDS, HTW, and GMA Monitoring List Requirements for Cells 1 through 8."

57. Commenting Organization: Ohio EPA

Section #: 2.3 Pg #: 11

Comment: The LCS and LDS tanks in the valve house should be pumped out after sample collection. This will make the next sample representative of water quality in the LCS/LDS each quarter.

58. Commenting Organization: Ohio EPA

Section #: 2.3 Pg #: 11

Comment: Isn't the current procedure to leave the sample ports open continuously to drain into the LCS/LDS tanks? If true, revise text accordingly.

59. Commenting Organization: Ohio EPA

Section #: 2.4 Pg #: 11

Comment: Explain why purging three well volumes are necessary. It may be more important to collect a sample than to remove all sample water through purging.

Attachment C/Appendix C - Fernald Preserve DQOs Monitoring Program for the OSDF

60. Commenting Organization: Ohio EPA

Section #: 5.0 Pg #:4

Comment: Ohio EPA disagrees with this decision rule. Ohio regulations rely primarily on water quality data to determine if a cell may be leaking. Water quality and/or LDS flow rates should both be evaluated to determine if a cell is leaking.

Attachment D - Integrated Environmental Monitoring Plan

61. Commenting Organization: OEPA

Section #: General/IEMP Pg #: Line #:

Comment: Sediment sampling is mentioned in several places throughout Attachment D - IEMP. However DOE does not mention anything about the location change, G4 to G10, or the reasoning behind why the point needed to be moved. In addition, text should be added to the document regarding DOE's decision and the basis of the decision, of why the sediment sampling frequency was changed to once every 5 years. This information needs to be included in the LMIC.

62. Commenting Organization: Ohio EPA

Section #: 1.2 Pg #: 1-2

Comment: Clean-up activities are essentially completed. Revise the introductory paragraph accordingly. Clean-up of CWWAT and utility corridors will be conducted under a separate work plan that may include additional environmental monitoring.

63. Commenting Organization: OEPA

Section #: Figure 3-2 & 3.4.2.1 Pg #: 3-8 - 3-9 Line #: Second paragraph

Comment: Appears to be a typo either in the text or on Figure 3-2. The text states that the uranium plume on Figure 3-2 illustrates groundwater conditions from 2007. However, the title on Figure 3-2 states the plume is from 2008. Please make the appropriate correction.

64. Commenting Organization: Ohio EPA

Section #: Figure 3-6 Pg #: 3-28

Comment: This figure indicates that GMA wells for the OSDF will be sampled semiannually. Per agreement with Ohio EPA, OSDF/GMA wells are to be sampled for total uranium quarterly.

65. Commenting Organization: OEPA

Section #: 3 Pg #: 3-46 Line #: 31

Comment: DOE should provide a schedule for reporting the groundwater transport modeling results.

66. Commenting Organization: OEPA

Section #: 4.3.2.1/Table 4-2 Pg #: 4-4 - 4-7 Line #: First paragraph pg 4-7

Comment: This paragraph discusses sediment locations and their analysis on Table 4-2. However, there does not appear to be data that relates to sediment on Table 4-2. Please make the appropriate corrections to Table 4-2.

67. Commenting Organization: Ohio EPA
Section #: 5.0 Pg #: 5-1

Comment: In October 2009 Ohio EPA requested a statistical report justifying the cessation of air monitoring. Receipt of this report is important in closing out air monitoring at the Fernald Preserve

68. Commenting Organization: Ohio EPA
Section #: 5.2 Pg #: 5-1

Comment: It is inappropriate to use prior year's air monitoring data to calculate an air dose. Ohio EPA is awaiting the report from DOE that should indicate that radionuclide air concentrations at the Fernald Preserve are indistinguishable from background and/or less than 1 mrem. DOE should report the dose as such in future years and reference the report.

69. Commenting Organization: Ohio EPA
Section #: 5.3.3 Pg #: 5-2

Comment: First bullet, see previous comments about air dose.

70. Commenting Organization: Ohio EPA
Section #: 5.4.1 Pg #: 5-5

Comment: First bullet, see previous comments about air dose.

71. Commenting Organization: Ohio EPA
Section #: 5.4.2 Pg #: 5-6

Comment: Ohio EPA continues to maintain that the perimeter of the OSDF should be monitored for external radiation dose. It houses the highest concentration of contaminated soils on the site.

72. Commenting Organization: Ohio EPA
Section #: 5.6 Pg #: 5-9

Comment: 3rd bullet: Presenting monitoring results in the annual SER may not meet community concerns. Discussion with stakeholders during meetings in addition to the SER may be a better way to assure that community concerns are being met.

73. Commenting Organization: Ohio EPA
Section #: 5.8.1 Pg #: 5-10

Comment: Since trail locations with the highest residual radionuclide concentrations are used as monitoring locations for OSL dosimeters. The perimeter of the OSDF should also be monitored for external radiation since it has the highest residual radionuclide concentrations.

74. Commenting Organization: Ohio EPA
Section #: 5.9.2 Pg #: 5-2 Line #: na

Comment: This section will not be necessary if the report requested by Ohio EPA shows that air concentrations are indistinguishable from background and/or less than 1 mrem.

Ms Jane Powell
November 25, 2009
Page 12

75. Commenting Organization: Ohio EPA
Section #: 6.2 Pg #: 6-1 Line #: na
Comment: See previous comments about using historical data to estimate current dose.

Attachment D/Appendix A - Natural Resource Monitoring Plan

76. Commenting Organization: Ohio EPA
Section #: General Pg #: na
Comment: Additional appendices need to be considered for the inclusion of the Restored Area Maintenance Plan and the Wetland Mitigation Monitoring Plan.

77. Commenting Organization: Ohio EPA
Section #: 2.4 Pg #: 3
Comment: Add text to indicate that the US Department of Interior is represented by the US Fish and Wildlife Service as trustee of the Fernald Preserve.

78. Commenting Organization: Ohio EPA
Section #: 4.1.4 Pg #: 9
Comment: Reword the last sentence of the first paragraph to read, "Although surveys conducted in 1994 and 1995 indicated that no individuals were present-found...."

Attachment E - Community Involvement Plan

79. Commenting Organization: Ohio EPA
Section #: 3.0 Pg #: 3-1 Line #: na
Comment: Write out "Federal Facilities Compliance Agreement" in the second paragraph. At the first instance of using the "FFCA" acronym in this section, it needs to be written out in full.

80. Commenting Organization: Ohio EPA
Section #: 5.1.1 Pg #: 5-1 Line #: na
Comment: Write out "long-term surveillance and maintenance". At this first instance of using the "LTS&M" acronym in this section, it needs to be written out in full.

81. Commenting Organization: Ohio EPA
Section #: 5.1.1 Pg #: 5-1
Comment: Ohio recommends, as a minimum, semiannual public meetings. This is a great opportunity for all stakeholders to get together and share their comments in an inclusive environment, allowing for feedback between all parties.

Attachment E/Appendix A - Information Contacts

82. Commenting Organization: Ohio EPA
Section #: na Pg #: 1 Line #: na
Comment: Ohio EPA's web page has recently changed to www.epa.ohio.gov.

