



Department of Energy

3780



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JUL 23 2001

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0735-01

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE DRAFT PROJECT SPECIFIC PLAN FOR SAMPLING OF
MISCELLANEOUS AREAS FOR THE ON-SITE DISPOSAL FACILITY WASTE ACCEPTANCE
CRITERIA ATTAINMENT**

- References:
1. Letter, J. Saric to J. Reising, "PSP for Miscellaneous Area WAC Attainment," dated June 14, 2001
 2. Letter, T. Schneider to J. Reising, "Comments on the Project Specific Plan for Sampling of Miscellaneous Areas for OSDF WAC Attainment," dated June 21, 2001

In accordance with the Sitewide Excavation Plan, enclosed for your approval are responses to the Ohio Environmental Protection Agency (OEPA) comments on the draft Project Specific Plan (PSP) for Sampling of Miscellaneous Areas for the On-Site Disposal Facility (OSDF) Waste Acceptance Criteria (WAC) Attainment. A variance to this PSP was written to address Comment No. 3 and is also enclosed for your approval. Approval was received from the United States Environmental Protection Agency (USEPA) as referenced above.

JUL 23 2001

Mr. James A. Saric

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DOE-0735-01

If you have any questions regarding these documents or need further information, please contact Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

Enclosure: As Stated

cc w/enclosure:

K. Chaney, EM-31/CLOV

T. Schneider, OEPA-Dayton (three copies of enclosure)

F. Hodge, Tetra Tech

AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

M. Jewett, Fluor Fernald, Inc./MS52-2

J. D. Chiou, Fluor Fernald, Inc./MS52-0

D. Diallo, Fluor Fernald, Inc./MS52-0

T. Hagen, Fluor Fernald, Inc./MS65-2

F. Miller, Fluor Fernald, Inc./MS52-0

ECDC, Fluor Fernald, Inc./MS52-7

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RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE PROJECT SPECIFIC PLAN FOR SAMPLING OF MISCELLANEOUS AREAS
FOR ON-SITE DISPOSAL FACILITY WAC
(20600-PSP-0001, REVISION 0)

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: Ohio EPA
Section #: 3.0 Pg. #: 3-1 to 3-3 Line #: Commentator: OFFO
Code: C

Original Comment #: 1

Comment: This section states that the operational history of the SWL has not been well documented, but materials found are listed in the operational records. Due to the nature and variety of wastes reported and because this area was once a landfill, samples collected should include VOCs.

Response: This PSP specifically addresses bounding the known above-WAC locations. The nature of the SWL and the variety of wastes reported will be considered when developing the PSP for predesign of the SWL which will be submitted for review in August.

Action: None.

Commenting Organization: Ohio EPA
Section #: 4.3 Pg. #: 4-1 to 4-2 Line #: Commentator: OFFO
Code: C

Original Comment #: 2

Comment: Due to the history of the Fire Training Facility and the lack of data and information in this PSP, regarding the pre- and post-excavation samples, one sample inadequate to characterize for WAC in this area. A sampling approach should be used to establish the number of samples to be collected. In addition, after Ohio EPA's review of RA 28, it was concluded that Tc-99 must be added to the WAC sampling parameters for the FTF.

Response: The one sample collected in the FTF is to obtain information for the one historical location that is above-WAC. This sample is not intended to characterize the entire FTF area for WAC. A sampling approach to characterize the entire FTF will be presented in the PSP for predesign of the FTF which will be submitted for review in August.

Action: None.

Commenting Organization: Ohio EPA
Section #: Appendix A Pg. #: Table A-3 Line #: Commentator: OFFO
Code: C

Original Comment #: 3

Comment: This table lists the depth for the sample of 4-Nitroaniline in the Former Fire Training Facility as 'surface'. After reviewing the May 1995 Final Report on the Contamination at the Fire Training Facility Removal Action No. 28, it would appear that backfilling, to the maximum depth of 2 feet, occurred in the area of this sample. Therefore, sampling must occur at the top of the native soils, not in the surface. Please correct.

Response: Agree. After reviewing RA 28, it appears that backfilling occurred at 2 feet lifts. It also appears that two lifts were conducted. Therefore, the sample location will be collected to a depth of 5 feet and three 6-inch sample intervals will be collected and two additional locations will be collected nearby.

Action: Variance to the PSP will be completed and submitted for approval.

Commenting Organization: Ohio EPA

Commentator: OFFO

Section #: Figure 3-1

Pg. #:

Line #:

Code: C

Original Comment #: 4

Comment: Historical boring locations in the Solid Waste Landfill Area contain many data gaps, such as in the southwest area and the central area. Sampling will need to occur in this area for WAC verification. Also, no mention is made of the leachate which has been found flowing out of the landfill. Is this leachate located in the area of the already planned sampling locations? If it is not, then WAC sampling will need to be performed in the area of the leachate.

Response: Data gaps and further investigation of the SWL will be addressed in the PSP for predesign of the SWL.

Action: None.

VARIANCE / FIELD CHANGE NOTICE

V/FCN 20600PSP1-3

V/BS NO.: PROJECT/DOCUMENT/ECDC #20600-PSP-0001 Rev 0

Page 1 of 1

PROJECT TITLE: PSP for Sampling of Miscellaneous Area for OSDF WAC Attainment

Date: 7/3/01

VARIANCE / FIELD CHANGE NOTICE (Include justification):

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This Variance/Field Change Notice (V/FCN) documents additional sample intervals at sample location FTF-1 and two additional sample locations. The two additional sample locations are approximately 10 feet from FTF-1 and are shown on Figure 1. All three FTF locations will be advanced to a depth of 5 feet and sample intervals will be collected at 0.0'-0.5', 2.0'-2.5', 3.0'-3.5', and 4.5'-5.0'.

Replace Table C-3 in the PSP with the attached Table C-3.

Justification

After reviewing Removal Action 28 it was determined the area was backfilled during excavation in two foot lifts. Due to the backfilling during excavation multiple sample intervals are being collected. In response to OEPA's comments, two additional samples have been placed near the historical location to provide additional supporting data.

REQUESTED BY: Deanna Diallo

DATE: 7/3/01

| X IF REQD | VARIANCE/FCN APPROVAL | DATE | X IF REQD | VARIANCE/FCN APPROVAL | DATE |
|-----------|---|--------|-----------|--|--------|
| X | <i>Frank Thompson</i> QUALITY ASSURANCE | 7/3/01 | X | <i>Ph. G. C.</i> PROJECT MANAGER | 7/3/01 |
| | DATA QUALITY MANAGEMENT | | | <i>dma</i> Real-time Program Mgr | |
| X | <i>Domus M. Arco</i> ANALYTICAL CUSTOMER SUPPORT | 7/3/01 | X | <i>Deanna Diallo</i> Characterization Manager | 7/3/01 |
| X | <i>Tom Buhlagi</i> Sampling Manager | 7/3/01 | X | <i>Deanna Diallo</i> WAC | 7/3/01 |

VARIANCE/FCN APPROVED YES NO

REVISION REQUIRED: YES NO

DISTRIBUTION

| | | |
|--------------------|----------------------------------|----------|
| PROJECT MANAGER: | DOCUMENT CONTROL: Jeannie Rosser | OTHER: |
| QUALITY ASSURANCE: | OTHER: | OTHER: |
| | | 5 |

TABLE C-3
FTF SOIL SAMPLE LOCATION

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| Boring ID | Sample ID | Northing | Easting | Estimated Boring Depth | Sample Depths at Boring Location (feet) | TAL |
|-----------|-------------|-----------|------------|------------------------|---|-----|
| FTF-1 | FTF-1-1-RM | 482571.00 | 1349471.00 | 0.5 | 0.0-0.5 | F |
| | FTF-1-1-SL | | | | | E |
| FTF-1 | FTF-1-4-RM | 482571.00 | 1349471.00 | 0.5 | 1.5-2.0 | F |
| | FTF-1-4-SL | | | | | E |
| FTF-1 | FTF-1-7-RM | 482571.00 | 1349471.00 | 0.5 | 3.0-3.5 | F |
| | FTF-1-7-SL | | | | | E |
| FTF-1 | FTF-1-10-RM | 482571.00 | 1349471.00 | 0.5 | 4.5-5.0 | F |
| | FTF-1-10-SL | | | | | E |
| FTF-2 | FTF-2-1-RM | 482571.00 | 1349481.00 | 0.5 | 0.0-0.5 | F |
| | FTF-2-1-SL | | | | | E |
| FTF-2 | FTF-2-4-RM | 482571.00 | 1349481.00 | 0.5 | 1.5-2.0 | F |
| | FTF-2-4-SL | | | | | E |
| FTF-2 | FTF-2-7-RM | 482571.00 | 1349481.00 | 0.5 | 3.0-3.5 | F |
| | FTF-2-7-SL | | | | | E |
| FTF-2 | FTF-2-10-RM | 482571.00 | 1349481.00 | 0.5 | 4.5-5.0 | F |
| | FTF-2-10-SL | | | | | E |
| FTF-3 | FTF-3-1-RM | 482561.00 | 1349471.00 | 0.5 | 0.0-0.5 | F |
| | FTF-3-1-SL | | | | | E |
| FTF-3 | FTF-3-4-RM | 482561.00 | 1349471.00 | 0.5 | 1.5-2.0 | F |
| | FTF-3-4-SL | | | | | E |
| FTF-3 | FTF-3-7-RM | 482561.00 | 1349471.00 | 0.5 | 3.0-3.5 | F |
| | FTF-3-7-SL | | | | | E |
| FTF-3 | FTF-3-10-RM | 482561.00 | 1349471.00 | 0.5 | 4.5-5.0 | F |
| | FTF-3-10-SL | | | | | E |

VI:60J31wdqnrhnpvftt_002.dgn

STATE PLANNED COORDINATE SYSTEM 1983

03-JUL-2001

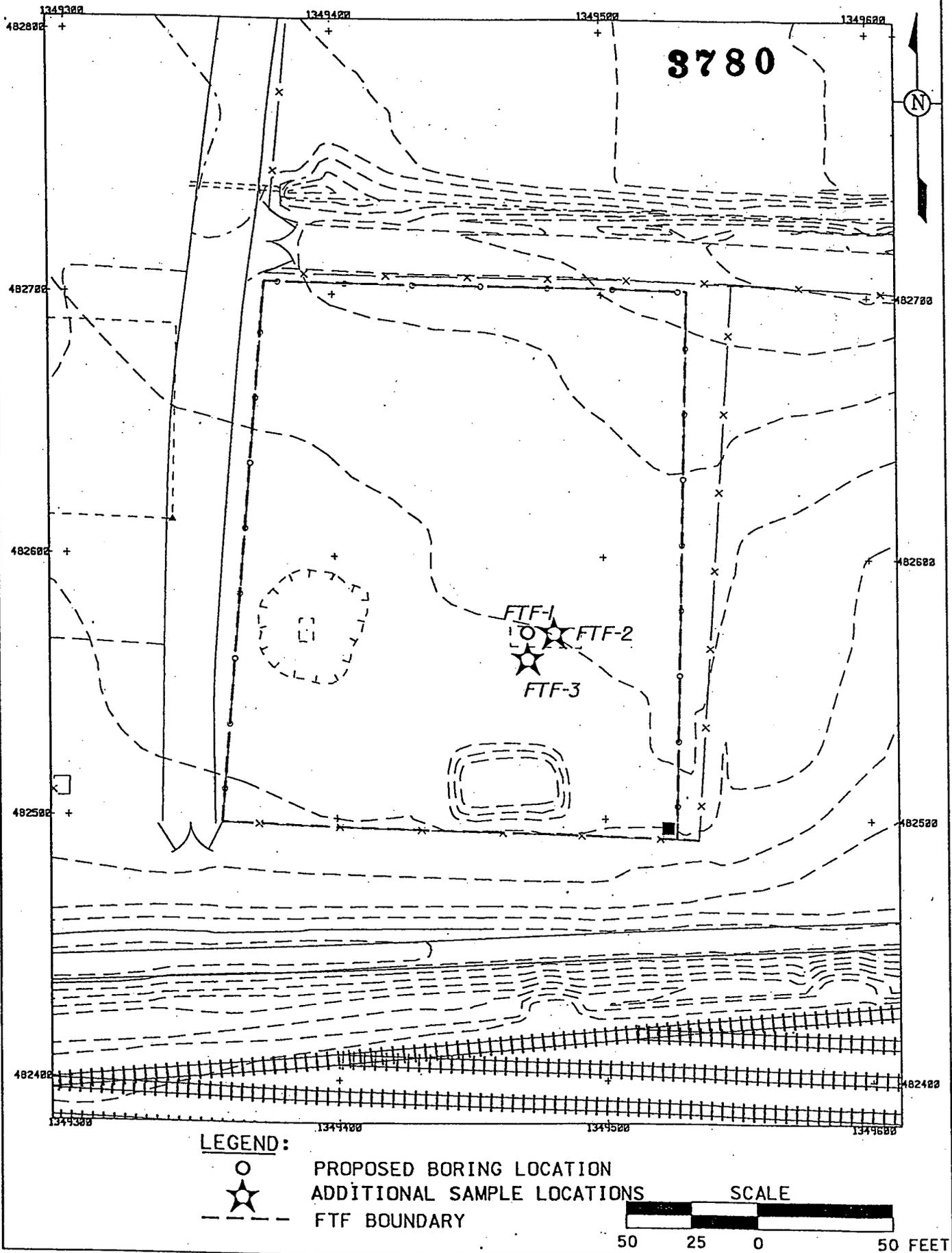


FIGURE 1. V/FCN 20600-PSP-0001-3

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