



Department of Energy

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Ohio Field Office
Fernald Environmental Management Project
P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155

SEP 12 2002

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-0708-02

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 RESPONSE TO OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENT AND THE REVISED PROJECT SPECIFIC PLAN FOR AREA 8, PHASE III-NORTH
PRECERTIFICATION REAL-TIME SCAN**

Reference: Letter, T. Schneider to J. Reising, "Disapproval - PSP for A8PIII-North
Precertification Real-Time Scan," dated August 14, 2002

Enclosed for your approval are responses to the Ohio Environmental Protection Agency
(OEPA) comment and the revised Project Specific Plan for Area 8, Phase III- North
Precertification Real-Time Scan.

If you have any questions 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

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Mr. James A. Saric
Mr. Tom Schneider

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DOE-0708-02

cc w/ enclosures:

T. Schneider, OEPA-Dayton (three copies of enclosure)
M. Cullerton, Tetra Tech
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:

R. Greenberg, EM-31/CLOV
R. J. Janke, OH/FEMP
A. Tanner, OH/FEMP
R. Abitz, Fluor Fernald, Inc./MS46
D. Carr, Fluor Fernald, Inc./MS2
J. Chiou, Fluor Fernald, Inc./MS64
T. Hagen, Fluor Fernald, Inc./MS9
E. Kroger, Fluor Fernald, Inc./MS64
F. Miller, Fluor Fernald, Inc./MS64
T. Poff, Fluor Fernald, Inc./MS65-2
ECDC, Fluor Fernald, Inc./MS52-7

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY
 COMMENTS ON THE DRAFT PROJECT SPECIFIC PLAN FOR
 AREA 8, PHASE III-NORTH PRECERTIFICATION REAL-TIME SCAN
 (21110-PSP-0003, REVISION A)

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

Commenting Organization: Ohio EPA Commentator: OFFO

Section #: Pg. #: Line #: Code: C

Original Comment #: 1

Comment: The PSP states, in several sections, that impacted soil above the FRL or hot spot delineation will be removed before certification through a V/FCN, including the collection of physical samples if needed. Ohio EPA believes that sampling and excavation of the area represents a significant change to the document, and should be done through a separate submittal not through a V/FCN.

Response: Agree. Considering the location and history of Area 8, the chance of discovering impacted soil is very slim. If a hot spot is confirmed, its delineation will be consistent with RTIMP guidelines. However, excavation of a large area would warrant preparing an excavation plan, followed by a separate PSP to address precertification physical sampling. Section 2.3 will be revised to reflect the exact verbiage used on the approved Area 8, Phase III-South Precertification Real-Time Scan PSP

Action: Revise Section 2.3 to read as follows: "Considering the location and history of Area 8, it is highly unlikely that any above-FRL contamination will be found. However, if a hot spot is confirmed (i.e., a Phase 2 HPGe result above 2x FRL at either detector height), time must be allowed to prepare for removal. The delineation approach will be determined by project management after considering all surrounding real-time results; however, the strategy must be consistent with RTIMP guidelines. Details of the hot spot delineation, if necessary, will be documented in a Variance/Field Change Notice (V/FCN)."