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DEC 19 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-0153-03

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

**TRANSMITTAL OF RESPONSES TO THE UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY COMMENTS AND THE FINAL CERTIFICATION REPORT FOR
AREA 2, PHASE I FORMER INACTIVE FLYASH PILE, SOUTH FIELD, CAROLINA AREA,
EAST-WEST CONSTRUCTION ROAD AND EQUIPMENT WHEEL WASH FACILITY**

- References:
1. Letter, T. Schneider to J. Reising, "Approval of the Certification Report and CDL for Area 2, Phase I," dated April 23, 2002
 2. Letter, J. Saric to J. Reising, "A2,PI Certification Report," dated May 1, 2002

Enclosed for your approval are responses to the United States Environmental Protection Agency (USEPA) comments and the final Certification Report for Area 2, Phase I (A2PI) as described above. This certification report has been revised to include the responses to the EPA comments as well as Phase III of certification, which completes the certification for the entirety of A2PI. As stated in the draft report, there were excavations that impacted the sampling schedule in A2PI and subsequently, have delayed certification in some areas. In addition, two total uranium hot spots were identified, one by physical sampling, the other by real time scanning, in the South Field; this area was excavated further and resampled as discussed in the report. These data, along with data from the third phase of A2PI certification, are presented in this report.

DEC 19 2002

Mr. James A. Saric
Mr. Tom Schneider

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DOE-0153-03

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

Sincerely,



FEMP:R.J. Janke

Johnny W. Reising
Fernald Remedial Action
Project Manager

Enclosures: As Stated

cc w/enclosures:

R. Janke, OH/FEMP
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SRF-5J
F. Bell, ATSDR
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:

R. Greenberg, EM-31/CLOV
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J. Reising, OH/FEMP
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D. Carr, Fluor Fernald, Inc./MS2
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ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENTS ON THE
DRAFT CERTIFICATION REPORT FOR THE AREA 2, PHASE I INACTIVE
FLYASH PILE, SOUTH FIELD, CAROLINA AREA, EAST-WEST ROAD
AND EQUIPMENT WHEEL WASH FACILITY
(20400-RP-0006, REVISION A)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA
Section #: 3.1
Original Comment #: 1

Commentator: Saric
Line #: 25

Pg. #: 3-2

Comment: The text states that contamination above final remediation levels was present to a 4-foot depth in a 100 by 100-foot area around IFP-13-3, that this area was sectioned into eight grids, and that one high-purity germanium (HPGe) measurement was taken at the center of each grid. The next sentence states that an additional 1-foot excavation was performed based on the one HPGe measurement taken within each 100 by 100-foot contamination grid. The text should be revised to clarify how many HPGe measurements were actually taken and what the size of each grid was.

Response: Agreed. The real-time scanning activity was documented in Variance/Field Change Notice 20300-PSP-0004-19.

Action: Text on Page 3-2 was revised as follows:

“Based on this contamination grid size (100 feet by 100 feet), the remainder of the IFP footprint was sectioned into nine 100-foot by 100-foot grids, and one HPGe measurement was taken in the center of each grid. This exercise resulted in an additional 1-foot excavation over southern end of the IFP, based on one HPGe measurement within each of nine 100-foot by 100-foot contamination grids.”

Commenting Organization: U.S. EPA
Section #: 3.1
Original Comment #: 2

Commentator: Saric
Line #: 5

Pg. #: 3-3

Comment: The text states that an additional 2-foot excavation occurred around IFP-13-3 as instructed by Fluor Fernald Construction. The text should be revised to explain the reason for this additional excavation.

Response: Agreed.

Action: Text on Page 3-3 was revised as follows:

“Based on these data, another 5 feet was excavated to reach the 10 parts per million (ppm) FRL for total uranium. Following this excavation, additional core samples were collected to determine whether the FRL had been attained. Based on these results, Fluor Fernald Construction instructed the excavation subcontractor to take another 2 feet immediately around IFP-13-3. After this March excavation, the depth at the IFP-13-3 location was 529 feet MSL.”