



Department of Energy
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AUG 27 2003

Mr. James A. Saric, Remedial Project Manager
 United States Environmental Protection Agency
 Region V, SR-6J
 77 West Jackson Boulevard
 Chicago, Illinois 60604-3590

DOE-0491-03

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 AND THE REVISED CERTIFICATION DESIGN LETTER AND PROJECT
 SPECIFIC PLAN FOR AREA 8, PHASE III-NORTH CERTIFICATION SAMPLING**

- References:
1. Letter, J. Saric to J. Reising, "A8,P3-North CDL and Certification Sampling," dated July 24, 2003
 2. Letter, T. Schneider to J. Reising, "Comments - PSP for A8P3-North," dated July 29, 2003

Enclosed for your approval are responses to Ohio Environmental Protection Agency (OEPA) comments and the revised Certification Design Letter (CDL) and Project Specific Plan (PSP) for Area 8, Phase III-North Certification Sampling. These documents have been revised to incorporate the OEPA comment responses as noted in Reference 2. Approval was received from the United States Environmental Protection Agency (USEPA) and is noted in Reference 1. In addition, a typographical error was noted and corrected in the target date for submittal of the Certification Report in Section 5 of the CDL. The target date for submittal of the draft Certification Report is December 3, 2003. Also, Sample Identifications in Appendix B of the PSP were corrected to reflect the guidelines for Sample Identification in Section 2.3.2.

AUG 27 2009

Mr. James A. Saric
Mr. Tom Schneider

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DOE-0491-03

If you have any questions or need further information, please contact Johnny Reising at (513) 648-3139.

Sincerely,



Glenn Griffiths
Acting Director

FCP:Sattler

Enclosure: As Stated

cc w/enclosure:

J. Sattler, OH/FCP
J. Reising, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SR-6J
F. Bell, ATSD
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

R. Greenberg, EM-31/CLOV
N. Hallein, EM-31/CLOV
R. Abitz, Fluor Fernald, Inc./MS64
J. Chiou, Fluor Fernald, Inc./MS64
M. Frank, Fluor Fernald, Inc./MS64
T. Hagen, Fluor Fernald, Inc./MS1
G. Lupton, Fluor Fernald, Inc./MS64
F. Miller, Fluor Fernald, Inc./MS64
T. Poff, Fluor Fernald, Inc./MS65-2
A. Porfidio, Fluor Fernald, Inc./MS64
D. Powell, Fluor Fernald, Inc./MS64
ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO OHIO EPA COMMENTS
ON THE DRAFT PROJECT SPECIFIC PLAN
FOR AREA 8, PHASE III-NORTH
CERTIFICATION SAMPLING**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

AUGUST 21, 2003

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO OHIO EPA COMMENTS ON THE
DRAFT CERTIFICATION DESIGN LETTER
FOR AREA 8, PHASE III-NORTH**

Commenting Organization: Ohio EPA
Section #: Figure 4-1 Pg #: Line #: Commentor: OFFO
Original Comment #: 1 Code: C

Comment: According to the text, A8P3-N contains three Group 1 CUs. Ohio EPA assumes these are CUs A8P3-1, A8P3-2, and A8P3-3. If this is correct, then according to the scale for Figure 4-1, A8P3-3 appears to be much larger than the 250'x250' limit set for Group 1 CUs in the SEP. Please correct.

Response: The text incorrectly stated that there were 3 Group 1 certification units (CUs). There are only two Group 1 CUs, A8P3-1 and A8P3-2. A8P3-3 is not a Group 1 CU. It is a Group 2 CU.

Action: Text in Section 4.1 will be revised to read as follows:

“As shown in Figure 4-1, ten CUs have been established in A8P3-N: two Group 1 CUs and eight Group 2 CUs. The two Group 1 CUs were established to surround the hot spot discussed in Section 2.2.

A description of the CUs are given below:

- CU A8P3-1 Group 1 CU impacted area centered around a radium hot spot
- CU A8P3-2 Group 1 CU west of radium hot spot along western site boundary fence line
- CU A8P3-3 through 6 Group 2 CUs in non-impacted area
- CU A8P3-7 Group 2 CU following steep sloped topography within non-impacted area
- CU A8P3-8 through 10 Group 2 CUs in non-impacted area”

Commenting Organization: Ohio EPA
Section #: Figure 4-1 Pg #: Line #: Commentor: OFFO
Original Comment #: 2 Code: C

Comment: Why is CU A8P3-7 shaped in the manner it is? This CU runs basically the length of the whole area being certified. It would seem that separating this area into two different CUs would be more appropriate. Please clarify.

Response: The A8P3-7 CU is shaped in this manner due to the topography of the area contained within this CU and was designed to maintain the topographical consistency throughout the entire CU. The size of this CU is approximately 230,000 square feet, which is under the maximum of 250,000 square feet (500 ft x 500 ft) allowable for a Group 2 CU. However, due to the extreme length of this CU, all archives plus an additional four random samples (one from each quadrant) for a total of 20 will be collected and analyzed for all constituents of concern (COCs) to provide increased sample density.

Action: Section 4.1 will be revised to state the following:

“Due to the length of the Group 2 CU, A8P3-7, all archives plus an additional four random samples (one from each quadrant) for a total of 20 will be analyzed for all A8P3-N COCs to provide increased sample density.”

**RESPONSES TO OHIO EPA COMMENTS ON THE
DRAFT CERTIFICATION DESIGN LETTER
FOR AREA 8, PHASE III-NORTH**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

AUGUST 21, 2003

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO OHIO EPA COMMENTS ON THE
DRAFT PROJECT SPECIFIC PLAN FOR
AREA 8, PHASE III-NORTH CERTIFICATION SAMPLING**

Commenting Organization: Ohio EPA
Section #: Figure 2-1 Pg #: Line #: Commentor: OFFO
Code: C
Original Comment #: 1

Comment: According to the text, A8P3-N contains three Group 1 CUs. Ohio EPA assumes these are CUs A8P3-1, A8P3-2, and A8P3-3. If this is correct, then according to the scale for Figure 2-1, A8P3-3 appears to be much larger than the 250'x250' limit set for Group 1 CUs in the SEP. Please correct.

Response: The text incorrectly stated that there were 3 Group 1 certifications units (CUs). There are only two Group 1 CUs, A8P3-1 and A8P3-2. A8P3-3 is not a Group 1 CU. It is a Group 2 CU.

Action: Text in Section 2.1 will be revised in the PSP to state the following:

“Within A8P3-N, ten CUs have been established; two Group 1 CUs and eight Group 2 CUs. The two Group 1 CUs were established to surround the hot spot discussed in the A8P3-N CDL.”

Commenting Organization: Ohio EPA
Section #: Figure 2-1 Pg #: Line #: Commentor: OFFO
Code: C
Original Comment #: 2

Comment: Why is CU A8P3-7 shaped in the manner it is? This CU runs basically the length of the whole area being certified. It would seem that separating this area into two different CUs would be more appropriate. Please clarify.

Response: The A8P3-7 CU is shaped in this manner due to the topography of the area contained within this CU and was designed to maintain the topographical consistency throughout the entire CU. The size of this CU is approximately 230,000 square feet, which is under the maximum of 250,000 square feet (500 ft x 500 ft) allowable for a Group 2 CU. However, due to the extreme length of this CU, all archives plus an additional four random samples (one from each quadrant) for a total of 20 will be collected and analyzed for all constituents of concern (COCs) to provide increased sample density.

Action: Section 2.1 of the PSP will be revised to include the following:

“Due to the length of the Group 2 CU, A8P3-7, all archives plus an additional four random samples (one from each quadrant) for a total of 20 will be analyzed for all A8P3-N COCs to provide increased sample density.”

The table in Appendix B of the PSP will be updated to include these four additional samples and to list that the four archive samples will be analyzed for all A8P3-N COCs.