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

OCT 01 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-0530-03

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 EXCAVATION PLAN FOR AREA 1, PHASE IV**

- References:
1. Letter, J. Saric to J. Reising, "A1,P4 Excavation Plan," dated August 25, 2003
 2. Letter, T. Schneider to J. Reising, "Excavation Plan for Area 1, Phase IV," dated September 16, 2003

Enclosed for your approval are responses and the revised Excavation Plan for Area 1, Phase IV. This has been revised to include Ohio Environmental Protection Agency (OEPA) comment responses as noted in Reference 2. The draft plan was approved by the United States Environmental Protection Agency (USEPA) as noted in Reference 1.

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

Sincerely,

Glenn Griffiths
Acting Director

FCP:Reising

Enclosure: As Stated

Mr. James A. Saric
Mr. Tom Schneider

-2-

DOE-0530-03

cc w/enclosure:

D. Pfister, OH/FCP
J. Reising, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SR-6J
M. Cullerton, Tetra Tech
F. Bell, ATSDR
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
K. Johnson, OH/FCP
R. Abitz, Fluor Fernald, Inc./MS64
L. Barlow, Fluor Fernald, Inc./MS41
J. Chiou, Fluor Fernald, Inc./MS64
T. Hagen, Fluor Fernald, Inc./MS1
W. Hooper, Fluor Fernald, Inc./MS52-4
S. Lorenz, Fluor Fernald, Inc./MS41
F. Miller, Fluor Fernald, Inc./MS64
D. Powell, Fluor Fernald, Inc./MS64
T. Poff, Fluor Fernald, Inc./MS65-2
W. Zebick, Fluor Fernald, Inc./MS60
ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY'S
COMMENTS ON THE DRAFT EXCAVATION PLAN
FOR AREA 1, PHASE IV
(20730-PL-0001, REVISION A)**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

SEPTEMBER 2003

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY'S COMMENTS
ON THE DRAFT EXCAVATION PLAN FOR AREA 1, PHASE IV
(20730-PL-0001, REVISION A)**

FERNALD CLOSURE PROJECT

Commenting Organization: Ohio EPA
Section #: General Pg. #: Line #: Commentator: OFFO
Original Comment #: 1 Code: C

Comment: This Plan does not present any data or characterization information on the proposed excavation area. A separate data package was subsequently submitted to Ohio EPA and should be part of the revised document.

Response: Agree.

Action: The data package (Figure B-1 and Table B-1) submitted separately to Ohio EPA will be incorporated into the revised document as Appendix B. The following sentence will be added at the end of the first paragraph of Section 2.1: "Provided in Appendix B, Table B-1 provides a summary of analytical data from borings sampled within the Area 1, Phase IV boundary and Figure B-1 shows the boring locations."

Commenting Organization: Ohio EPA
Section #: 2.3 Pg. #: 3 Line #: 28-33 Commentator: OFFO
Original Comment #: 2 Code: C

Comment: This section describes breaking the concrete and scraping the soil. The Plan does not address WAC attainment for the concrete. The Plan does note that the soil will be scanned but the Plan does not describe the actions to be performed to assure WAC compliance. Reference should be made to the scanning strategies as outlined in the SEP.

Response: Agree. Initially, characterization of the concrete will be determined by the associated predesign data. Secondary evaluation will be based upon WAO personnel observations that the debris is visually clean. If predesign data has not been obtained for the subject area, the material will be temporarily staged and disposition will be determined by real-time monitoring results of the underlying soil surface and visual observation.

Action: Additional sentences will be added to the beginning of the paragraph as follows: "Initially, characterization of the concrete will be determined by the associated predesign data. Secondary evaluation will be based upon WAO personnel observations that the debris is visually clean. If predesign data has not been obtained for the subject area, the material will be temporarily staged and disposition will be determined by real-time monitoring results of the underlying soil surface and visual observation."

Commenting Organization: Ohio EPA
Section #: 1.1 Pg. #: 1 Line #: 17-19 Commentator: OFFO
Original Comment #: 3 Code: C

Comment: The Plan states: "This Excavation Plan addresses the steps required to obtain certification for this area prior to subgrade preparation activities for OSDF Cell 8." We disagree with this sentence. This Plan addresses those activities, which must be completed to facilitate the construction of Cell 8. A separate plan will be required to actually effectuate certification.

Response: Agree.

Action: The sentence will be rewritten and an additional sentence will be added as follows: "This excavation plan addresses the activities that must be completed to facilitate the construction of the OSDF Cell 8 footprint. Prior to subgrade preparation of the OSDF Cell 8 footprint, the area will be sampled for certification and will be certified with the agency approval of the area-specific certification report."

Commenting Organization: Ohio EPA
 Section #: 2.2 Pg. #: 3 Line #: 11-13 Commentator: OFFO
 Code: C
 Original Comment #: 4

Comment: The Plan states that two culverts will remain after remediation and goes on to say that they will be removed along with the remediation of "F" Street. A reference to the D&D Implementation Plan which will accomplish this removal should be added to the text.

Response: The referenced culverts will be removed in accordance with the Implementation Plan for Area 7, Phase III.

Action: An additional sentence will be added as follows: "The removal of these culverts will be addressed in the Implementation Plan for Area 7, Phase III."

Commenting Organization: Ohio EPA
 Section #: 2.1 Pg. #: 2 Line #: Commentator: OFFO
 Code: C
 Original Comment #: 5

Comment: This section addresses the remediation of soil in the area of the two elevated fuel storage tanks. The removal and disposition of the tanks and piping are the responsibility of the D&D Project. This Plan should be revised to address the prohibition of characteristic hazardous waste (ignitability) from the OSDF and also the prohibition of materials that are deleterious to the geomembrane liners in the OSDF.

Response: Characteristic hazardous waste and materials that are deleterious to the geomembrane liners in the OSDF should not be placed in the OSDF. As these storage tanks held both diesel fuel and gasoline, the soil around the tank will be monitored with a PID. As described in the WAC Plan, if the action level of 5 ppm is exceeded over the soil, the material will be segregated for follow-up visual examinations to determine if free-phase organic concentrations are present. Soil containing free-phase organic materials is prohibited from the OSDF.

Action: In Section 2.1, the end of the third paragraph will be revised to include the following sentence: "As these tanks contained fuel, efforts will be made to prevent characteristic hazardous waste or materials that are deleterious to the geomembrane liners in the OSDF from being placed in the OSDF."

The last sentence of Section 2.3 will be revised to state the following: "Any above-WAC material including ignitable materials or materials that are deleterious to the liners of the OSDF will not be placed in the OSDF. These materials will be segregated for treatment or disposed of accordingly."

Commenting Organization: Ohio EPA
 Section #: Figures 1 and 2 Pg. #: Line #: Commentator: OFFO
 Code: C
 Original Comment #: 6

Comment: Part of Figure 1 and 2 are still marked as Area 7. Figure 1 should also be revised to more clearly show the delineation of Area 1, Phase IV.

Response: This Excavation Plan only addresses Area 1, Phase IV. There is no reference to Area 7 on Figure 2. Area 1, Phase IV is shown correctly on Figure 1. The reference to Area 7 is shown only as an adjacent area on Figure 1.

Action: Figure 1 will be modified so that Area 1, Phase IV stands out.

Commenting Organization: Ohio EPA

Commentator: OFFO

Section #: General

Pg. #:

Line #:

Code: C

Original Comment #: 7

Comment: This Plan does not present any data or characterization information on the proposed excavation area. A separate data package was subsequently submitted to Ohio EPA and should be part of the revised document.

Response: Agree.

Action: The data package (Figure B-1 and Table B-1) submitted separately to Ohio EPA will be incorporated into the revised document as Appendix B. The following sentence will be added to at the end of the first paragraph of Section 2.1: "Provided in Appendix B, Table B-1 provides a summary of analytical data from borings sampled within the Area 1, Phase IV boundary and Figure B-1 shows the boring locations."