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OCT 21 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-0019-04

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 COMMENTS ON THE PROJECT SPECIFIC PLAN FOR
 GENERAL CHARACTERIZATION FOR SITEWIDE SOIL REMEDIATION, PROJECT SPECIFIC
 PLAN GUIDELINES FOR GENERAL CHARACTERIZATION FOR SITEWIDE SOIL
 REMEDIATION, AND THE PROJECT SPECIFIC PLAN FOR EXCAVATION CONTROL OF
 AREAS 3B/4B/5**

- References:
1. Letter, J. Saric to J. Reising, "General Characterization for Sitewide Soil PSP," dated September 26, 2003
 2. Letter, T. Schneider to J. Reising, "Disapproval - PSP for General Characterization for Sitewide Soil Remediation," dated September 26, 2003

Enclosed for your approval are responses to the United States Environmental Protection Agency (USEPA) comments on the Project Specific Plan (PSP) for General Characterization for Sitewide Soil Remediation and the revised PSP with USEPA comments incorporated from the reference noted. This revision addresses the expectations listed in the Ohio Environmental Protection Agency's (OEPA) disapproval letter as noted above. Based on the responses to USEPA's comments, the title of the PSP for General Characterization for Sitewide Soil Remediation has been revised and is now entitled, "PSP Guidelines for General Characterization for Sitewide Soil Remediation."

OCT 21 2003

DOE-0019-04

Mr. James A. Saric
Mr. Tom Schneider

-2-

Also enclosed for your review is the PSP for Excavation Control of Areas 3B/4B/5. This is the first supplemental PSP that provides an example of how future documents are expected to be submitted.

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

Sincerely,



Glenn Griffiths
Acting Director

FCP:Reising

Enclosures: As Stated

cc w/enclosures:

J. Reising, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosures)
G. Jablonowski, USEPA-V, SR-6J
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
N. Hallein, EM-31/CLOV
K. Johnson, OH/FCP
R. Abitz, Fluor Fernald, Inc./MS64
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T. Hagen, Fluor Fernald, Inc./MS1
G. Lupton, Fluor Fernald, Inc./MS64
F. Miller, Fluor Fernald, Inc./MS64
K. Payne, Fluor Fernald, Inc./MS64
T. Poff, Fluor Fernald, Inc./MS65-2
D. Powell, Fluor Fernald, Inc./MS64
ECDC, Fluor Fernald, Inc./MS52-7



**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY'S
TECHNICAL REVIEW COMMENTS ON THE
DRAFT PROJECT SPECIFIC PLAN FOR GENERAL CHARACTERIZATION
FOR SITEWIDE SOIL REMEDIATION
(20300-PSP-0011, REVISION 0)**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

OCTOBER 2003

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY'S
TECHNICAL REVIEW COMMENTS ON THE
DRAFT PROJECT SPECIFIC PLAN FOR GENERAL CHARACTERIZATION
FOR SITEWIDE SOIL REMEDIATION
(20300-PSP-0011, REVISION 0)**

FERNALD CLOSURE PROJECT

GENERAL COMMENTS

Commenting Organization: U.S. EPA
Section #: Not Applicable (NA) Page #: NA
Original General Comment #: 1 Commentor: Saric
Line #: NA

Comment: The Project Specific Plan (PSP) states that all work performed under the PSP will be executed through the Variance/Field Change Notice (V/FCN) process. The text further states that the V/FCNs will present the (1) reason to sample, (2) sampling locations, (3) number of borings, and (4) depth intervals. More information on the content of the V/FCNs should be provided. The V/FCNs should (1) include background information on the areas and subareas to be investigated, (2) identify the monitoring equipment to be used, (3) identify the laboratory methods to be used, and (4) specify deviations from the PSP. The background information to be provided in the V/FCNs should include information on (1) special conditions in the areas and subareas, such as the presence of technetium-99, the presence of Resource Conservation and Recovery Act (RCRA) waste, or a 20-part per million final remediation level (FRL) for uranium, and (2) areas known to have exceedances of the On-Site Disposal Facility waste acceptance criteria and FRLs.

Response: The strategy of this PSP has changed such that the PSP serves as a guideline document. Supplemental PSPs will continue to be written that will include the area specific pertinent information. The supplemental PSPs will not contain any of the repetitive information unless the information has been modified to meet the area specific conditions.

The background information will include all information pertinent to the areas as described in the above comment.

Action: Revise the strategy of the "Project Specific Plan For General Characterization For Sitewide Soil Remediation" to include the supplemental PSPs in place of V/FCNs. The title of the PSP will be changed to: "Project Specific Plan Guidelines for General Characterization for Sitewide Soil Remediation".

Include background information in the supplemental PSPs as applicable.

Commenting Organization: U.S. EPA
Section #: NA Page #: NA
Original General Comment #: 2 Commentor: Saric
Line #: NA

Comment: Figures 2-1 through 2-5 show the areas to be addressed under the PSP. However, the text of Section 2.0 indicates that in some areas, only certain subareas will be addressed under the PSP. For example, the text states that Area 6 predesign activities will be performed at (1) the General Area and Rail Spur Area, (2) the Former Production Area, and (3) the Biosurge Lagoon. However, these subareas are not shown in Figure 2-3. Figures 2-1 through 2-5 should be revised to show the subareas to be addressed under the PSP.

Response: Agree. As described in the response to USEPA General Comment #1, PSPs will be developed and submitted for agency approval to support activities such as predesign, excavation control, and precertification, instead of V/FCNs. Figures will continue to be provided in the PSPs, and the Figures will better define each Area/subarea covered under the scope of the PSPs.

Action: Figures 2-1, 2-3, and 2-4 will be modified to identify each subarea in Area 2, Area 6, and Area 7, respectively. The modified figures will be submitted with the revised document. Figures 2-2 and 2-5 will remain unchanged.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: NA

Page #: NA

Line #: NA

Original General Comment #: 3

Comment: The PSP defines a hot spot for uranium and thorium-232 as an area whose concentration is three times the FRL. However, the 1998 Sitewide Excavation Plan defines a hot spot for these constituents as an area whose concentration is two times the FRL if the area is greater than 10 square meters (m^2) and three times the FRL if the area is less than 10 m^2 . The PSP should be revised to explain why hot spot definition is different from that of the Sitewide Excavation Plan.

Response: A hot spot, as described in the PSP, pertains to real-time measurements. Per real-time protocol, a hot spot is an area whose concentration is greater than 3xFRL. The Sitewide Excavation Plan's description of a hot spot being an area whose concentration exceeds 2 x FRL for an area greater than 10 m^2 and 3 x FRL if an area is less than 10 m^2 pertains to physical sampling.

Action: None.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 4.2

Page #: 4-3

Line #: 4 and 5

Original Specific Comment #: 1

Comment: The text states that if an interval greater than 450 counts per minute (ccpm) is detected in a soil sample, a biased sample will be collected. The text should be revised to identify the source of the specified action level of 450 ccpm. If this action level is identified in another sitewide document, that action level is identified in another sitewide document, that document should be referenced in the PSP.

Response: The collection of a biased sample when a frisker reading is greater than 450 corrected counts per minute (ccpm) is not driven by requirements of any sitewide document but rather a "best management practice" when collecting samples for radiological analysis, based on general experience and practice followed during other predesign or excavation control sampling events.

Action: None.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 4.2

Page #: 4-3

Line #: 20 to 22

Original Specific Comment #: 2

Comment: The text states that if there is insufficient soil mass in a 6-inch interval for a particular analysis, additional soil material will be obtained by performing an additional push. The text should be revised to clarify that the additional push will be performed adjacent to the original boring location and to the same depth interval.

Response: Agree.

Action: The text will be revised to state, "If a 6-inch interval contains insufficient soil mass for the necessary analyses, additional material can be obtained by performing an additional push adjacent to and to the same depth interval as the original boring location."

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 7.3

Page #: 7-2

Line #: NA

Original Specific Comment #: 3

Comment: This section lists many site-specific standards and procedures that will apply to work done under the PSP. Data Quality Objectives SL-048, SL-054, and SL-055 are included in the PSP, but the other standards and procedures are not. For example, procedures ALS 9501 for shipping samples to off-site laboratories is not included, and the text does not specify where this procedure can be found. The text of Section 7.3 should be revised to reference other documents containing the relevant standards and procedures that are not included in the PSP.

Response: The text as written in Section 7.3 is the standard format that is presented in all PSPs. The documents listed are governed by FCP Requirements Manual RM-0016. If the USEPA would like to have an informational copy of any of these documents, one can be provided upon request.

Action: None.