

## Southwest District Office

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January 7, 2004

Mr. William J. Taylor  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

WJL:bjc

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E-0324

**Re: Comments - PSP for Predesign Characterization of Sediments in Paddys Run and Associated Drainage Features**

Dear Mr. Griffiths:

Ohio EPA has reviewed DOE's submittal, "Project Specific Plan for Predesign Characterization of Sediments in Paddys Run and Associated Drainage Features" received on December 5, 2003. Based upon this review, Ohio EPA's comments are enclosed.

If you have any questions, please contact Michelle Waller or me at (937) 285-6466.

Sincerely,



Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA  
Terry Hagen, FDF  
Ruth Vandergrift, ODH  
Mark Shupe, HSI GeoTrans  
Michelle Cullerton, Tetra Tech EM Inc.

**OEPA Comments on PSP for Predesign Characterization of Sediments  
In Paddys Run and Associated Drainage Features**

1. Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: general                      Pg #:                      Line #: NA      Code: E  
Original Comment #: On all future documents, please submit documents containing line numbers to facilitate the review and comments, as has been done in the past.
  
2. Commenting Organization: Ohio EPA                      Commentor: DSW  
Section #: 2.1                      Pg #: 2-2                      Line #: NA      Code: E  
Original Comment #:  
Comment: "sough" should be "south"
  
3. Commenting Organization: Ohio EPA                      Commentor: DSW  
Section #: 2.1                      Pg #: 2-2                      Line #: NA      Code: C  
Original Comment #:  
Comment: The acronym SSLD is used in the last paragraph and is not defined in the acronym list. No one in our office is familiar with this acronym. Please define.
  
4. Commenting Organization: Ohio EPA                      Commentor: DSW  
Section #: 2.5.2.1                      Pg #: 2-6                      Line #: NA      Code: C  
Original Comment #:  
Comment: The statement is made that "If there is too much water to perform the sampling, the location will be moved north of south away from the nearest transect..." The presence of a pool of water is indicative of a depositional area and is the most likely area to locate contamination. Moving the sample location is not advised and some means of obtaining the sample from the depositional area is preferred. Devices are available to obtain cores from the bottom of Lake Erie, so obtaining a sample should not be beyond any technical limitation.
  
5. Commenting Organization: Ohio EPA                      Commentor: DSW  
Section #: 2.5.2.1                      Pg #: 2-7                      Line #: NA      Code: C  
Original Comment #:  
Comment: Reference is made to taking samples from 0-0.5' in most cases with some deeper cores being required. Review of the sample information in Appendix B shows only the three RTB samples (page B-14) as having depths greater than 0.5'. There is, however, a high probability that legacy contamination deposited in the old streambed would be covered with greater than 0.5' of recent material. On page 2-3 of the document, this seems to be recognized by the statement, "If contamination is present it is also most likely buried beneath clean layers of more recent deposition". We agree that it is less likely that any contamination in the active channel would be found at depths greater than 6". However, areas outside of the channel may have more material in the overburden. Areas of likely deposition (as stated in the document "areas immediately downstream of sharp bends..." and at confluences) should be sampled at greater depth. The criteria stated in 2.5.2.1 on page 2-7 could apply to the appropriate depth, as determined by a geologist, at these locations (e.g. depositional material differing from non-depositional soils).

6. Commenting Organization: Ohio EPA                      Commentor: DSW  
Section #: NA              Pg #: NA              Line #: NA              Code: C  
Original Comment #:  
Comment: A draft figure with contamination above the FRL in the SSOD was provided to us. Please be sure to include this in the PSP.
7. Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: Table 2-2              Pg #: 2-11              Line #: na              Code: C  
Original Comment #:  
Comment: The third sample listed on the chart (PR166) is listed as a sediment FRL exceedance. According to the sediment FRL on Table 2-1, this sample does not exceed the FRL. The sediment FRL for Radium-226 is 2.9 pCi/g as listed in Table 2-1. The sampling result for PR166 in Table 2-2 is 2.3. If this is correct, this entry in the table should be removed.
8. Commenting Organization: Ohio EPA                      Commentor: DSW  
Section #: Figure 2-7              Pg #: NA              Line #: NA              Code: C  
Original Comment #:  
Comment: The transect interval for sampling in the Pilot Plant Drainage Ditch seems excessive. It would seem that more transects placed in areas of deposition along the ditch would be most appropriate. This ditch would not experience the same dynamic changes that Paddys Run would and the depositional areas were more likely to remain the same over time. For example, from the NPDES 4005 sampling point, there are two places to the east that are likely depositional areas, i.e. the pool at NPDES and an additional pool downstream of there. There is also a depositional area just upstream of the culvert emptying into the pool at NPDES 4005. It appears, from the figure, that PPDDT-3 may be in the area of the PPDD that was moved to accommodate the widening of the road around OU4. If so, there is little likelihood of locating any legacy contamination here, and the transect should be moved appropriately.