



Department of Energy

Ohio Field Office
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DEC 19 2004

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-0082-05

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 ADDENDUM NO. 1
TO THE AREA 2, PHASE II IMPLEMENTATION PLAN FOR SUBAREA 3
(INFRASTRUCTURE) SUBCONTRACTOR LAYDOWN AREA AND EQUIPMENT
WASH FACILITY AND THE DRAFT PROJECT SPECIFIC PLAN FOR THE
EXCAVATION CONTROL FOR AREA 2, PHASE II – SUBAREA 3 (SUPPLEMENT
TO 20300-PSP-0011)**

- References:
- 1) Letter, T. Schneider to W. Taylor, "Comments – PSP for Excavation Control A2P2S3," dated November 30, 2004
 - 2) Letter, T. Schneider to W. Taylor, "Disapproval – Addendum No. 1 to the IP for A2PII – Subarea 3 (Infrastructure) SLA and EWF," dated November 30, 2004
 - 3) Comments, J. Saric to J. Reising, "Technical Review Comments on Project Specific Plan for the Excavation Control of Area 2, Phase II – Subarea 3 (Supplement to 20300-PSP-0011)," dated December 2, 2004
 - 4) Comments, J. Saric to J. Reising, "Technical Review Comments on Addendum No. 1 to the Implementation Plan for Area 2, Phase II – Subarea 3 (Infrastructure) Subcontractor Laydown Area and Equipment Wash Facility," dated December 2, 2004

12-5773

Mr. James A. Saric
Mr. Tom Schneider

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DOE-0082-05

Enclosed for your review and approval are responses to the United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA) comments on Area 2, Phase II Implementation Plan Addendum No. 1 for Subarea 3 (Infrastructure) Subcontractor Laydown Area and Equipment Wash Facility and the draft Project Specific Plan (PSP) for the Excavation Control of A2PII - Subarea 3 (Supplement to 20300-PSP-0011). Upon approval, these comment responses will be incorporated into the appropriate addendum and PSP.

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

Sincerely,


William J. Taylor
Director

FCP:Reising

Enclosures: As Stated

cc w/enclosures:

D. Pfister, OH/FCP

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

Mr. James A. Saric
Mr. Tom Schneider

cc w/o enclosures:

- R. Abitz, Fluor Fernald, Inc./MS64
- K. Alkema, Fluor Fernald, Inc./MS01
- L. Barlow, Fluor Fernald, Inc./MS52-3
- D. Brennan, Fluor Fernald, Inc./MS64
- J. Chiou, Fluor Fernald, Inc./MS64
- M. Frank, Fluor Fernald, Inc./MS64
- K. Harbin, Fluor Fernald, Inc./MS60
- F. Johnston, Fluor Fernald, Inc./MS52-5
- U. Kumthekar, Fluor Fernald, Inc./MS64
- S. Lorenz, Fluor Fernald, Inc./MS52-3
- F. Miller, Fluor Fernald, Inc./MS64
- C. Murphy, Fluor Fernald, Inc./MS01
- D. Nixon, Fluor Fernald, Inc./MS01
- D. Powell, Fluor Fernald, Inc./MS64
- T. Snider, Fluor Fernald, Inc./MS64
- B. Zebick, Fluor Fernald, Inc./MS60
- ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO
U. S. ENVIRONMENTAL PROTECTION AGENCY AND
OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON ADDENDUM NO. 1 TO THE
IMPLEMENTATION PLAN FOR AREA 2, PHASE II –
SUBAREA 3 (INFRASTRUCTURE) SUBCONTRACTOR
LAYDOWN AREA AND EQUIPMENT WASH FACILITY**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

DECEMBER 2004

U.S. DEPARTMENT OF ENERGY

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3. Commenting Organization: US EPA
Section #: 2.3.2.2
Original Specific Comment #: 3
Pg #: 2-4
Commenter: Saric
Line #: 7 through 11
Comment: The text states that arsenic levels detected at depth are consistent with background conditions. However, no background data for arsenic is referenced or provided in the text. The text should be revised to include background data for arsenic.

Response: Agree. The supporting documentation for this approach, which is the addendum to the CERCLA/RCRA Soil Background Study, will be referenced in this section.

Action: This paragraph will be rewritten to include a reference to the addendum to the CERCLA/RCRA Soil Study.

4. Commenting Organization: U.S. EPA
Section #: 2.3.2.2
Original Specific Comment #: 4
Pg #: 2-4
Commenter: Saric
Line #: 13
Comment: The text states that aroclor-1254 concentrations were detected above the final remediation level (FRL) at depths up to 2.5 feet. Neither the text or Table 2-2 includes the FRL for aroclor-1254. The text and Table 2-2 should be revised to include the FRL for aroclor-1254.

Response: Agree. Table 2-2 and the text will be amended to include the FRL for aroclor-1254.

Action: Table 2-2 and the text will be amended to include the FRL for aroclor-1254.

5. Commenting Organization: U.S. EPA
Section #: 2.4
Original Specific Comment #: 5
Pg #: 2-4
Commenter: Saric
Line #: 20 through 22
Comment: The text states that Table 2-1 lists both the preliminary constituents of concern (COC) and the revised COCs. Table 2-2 lists only the revised COCs. The text should be revised to provide a table listing the preliminary COCs and the justification for selecting the list of revised COCs.

Response: The two tables were inserted incorrectly and also referenced improperly.

The last sentence of Section 2.4 (Page 2-4, Lines 25 and 26) and the revised text as stated below, presents the justification for the revised ASCOC list for excavation control purposes to increase efficiency during the field excavation. The revised list presents the analytes that were detected above the FRLs and will therefore drive the excavation. The revised list also includes the remainder of the sitewide primary COCs as these primary COCs are always carried through the remediation/certification process. These lists do not necessarily reflect the final certification approach after excavation, which may include additional COCs.

Action: For clarity, these sentences will be revised to state the following:

“Table 2-1 identifies the preliminary list of COCs for Area 2, Phase II Subarea 3 that was utilized during the predesign investigation. However, based on the results of the predesign sampling and analysis, which demonstrate that the majority of the predesign secondary COCs were not detected above their respective FRLs, a revised list of COCs was developed and is presented in Table 2-2 for excavation control purposes.”

Accordingly, these two referenced tables will be inserted correctly.

6. Commenting Organization: U.S. EPA
Figure #: 2-2 Pg #: 2-8 Commenter: Saric
Line #: Not Applicable (NA)
Original Specific Comment #: 6
Comment: The boundary line outlining the Subcontractor Laydown Area in Figure 2-2 is different than the boundary presented in Drawing 99X-5500-G-00814 in Appendix A. Figure 2-2 should be revised to resolve this discrepancy.
- Response: Agree. Figure 2-2 will be amended to agree with the engineering drawings found in Appendix A.
- Action: Figure 2-2 will be amended to agree with the engineering drawings found in Appendix A, which effectively removes the area surrounding the former SP-3 footprint.
7. Commenting Organization: U.S. EPA
Section #: 3.2 Pg #: 3-2 Commenter: Saric
Line #: 26 through 33
Original Specific Comment #: 7
Comment: The text discusses soil excavation and impacted material removal for the Equipment Wash Facility. However, the text does not discuss soil excavation and impacted material removal for the Subcontractor Laydown Area. The text should be revised to discuss soil excavation and impacted material removal for the Subcontractor Laydown Area.
- Response: Agree.
- Action: The text will be revised accordingly.
8. Commenting Organization: U.S. EPA
Section #: 3.2 Pg #: 3-3 Commenter: Saric
Line #: 8 and 9
Original Specific Comment #: 8
Comment: The text states that material will be reloaded at the temporary staging area for direct haul to either the On-Site Disposal Facility (OSDF) for on-site disposition or SP-7 for subsequent off-site disposition. This statement indicates that material above and below the waste acceptance (WAC) criteria could both be placed in the temporary staging area. Above-WAC and below-WAC material could be commingled in the temporary staging area and ultimately disposed in the wrong location. The text should be revised to provide procedures for segregating above-WAC and below-WAC material in the temporary staging area.
- Response: Agree.
- Action: The text will be revised to clarify the segregation and disposition of of above- and below-WAC material.
9. Commenting Organization: U.S. EPA
Section #: 3.3 Pg #: 3-3 Commenter: Saric
Line #: 13 and 14
Original Specific Comment #: 9
Comment: The text states that a Certification Design Letter (CDL) and a Project Specific Plan (PSP) for sampling will be submitted at a future date. The text does not state whether the CDL and PSP will cover all six components of Subarea 3 or only the Equipment Wash Facility and the Subcontractor Laydown Area. The text should be revised to clarify the components that will be included in the CDL and PSP.
- Response: Agree.
- Action: The text will be revised to clarify the components that will be included in the CDL and PSP.

10. Commenting Organization: U.S. EPA
Section #: 3.3
Original Specific Comment #: 10

Pg #: 3-3

Commenter: Saric
Line #: 18 and 19

Comment: The text states that after excavation of the paved roadway, the area will be backfilled and a gravel roadway will be established where the paved roadway was removed. The plan should be revised to include a drawing showing the location and proposed elevations for the gravel roadway.

Response: Disagree. The roadway is being re-established at approximately at the same elevation and alignment as the existing roadway. Therefore, the plan does not need to be redesigned nor an additional drawing included.

Action: A note will be added to drawing 99X-5500-G-00814 stating that the roadway will be re-established approximately along the same elevation and alignment as the existing roadway.

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Action: This paragraph will be rewritten to include a reference to the Addendum to the CERCLA/RCRA Soil Study.

4. Commenting Organization: Ohio EPA Commenter: OFFO
Section #: 2.3.2.2 Pg #: 2-4 Line #: 13-17 Code: C
Original Comment #: 4

Comment: The PCB contamination in this area is likely the result of the subcontractor staging transformers in the area. It also suggests that additional areas of localized PCB contamination may exist within the area. The sampling approach implemented was obviously insufficient to characterize such hotspots. Excavation should be conducted in such a manner as to facilitate observation of soil staining or discoloration that would then be investigated with additional predesign sampling.

Response: We agree that a likely source of PCB contamination is from the staging of transformers in this area. Therefore, predesign samples were targeted and placed at these locations (i.e., predesign locations A2P2-SUB4 through A2P2-SUB7). Only one of these four locations exhibited above-final remediation level (FRL) conditions. All others were well below the FRL. An additional sample was placed outside of the staging area (A2P2-SUB3) to investigate any potential historical impact. The fact that we were able to identify the presence of a hotspot indicates the predesign approach was reasonable adequate.

The investigation into discolored soil to aid in discovering potential hot spots is not feasible during predesign as surface features such as gravel base roads, and vegetation prevent the visual identification. This type of activity can only be performed after all surface features have been removed exposing the underlying soil. Therefore, the excavation will be performed in such a manner to expose the underlying soil so that identification of discolored soil can be performed and investigated and/or further excavated.

Action: The Project Specific Plan for the Excavation Control of Area 2, Phase II – Subarea 3 (Supplement to 20300-PSP-0011) will be revised to include investigating areas of discolored soil for PCB contamination.

5. Commenting Organization: Ohio EPA Commenter: OFFO
Section #: 2.4 Pg #: 2-4 Line #: Code: C
Original Comment #: 5

Comment: The section inaccurately references the same table for two separate types of information. The first sentence suggests Table 2-1 includes the preliminary COC list. The second sentence then states Table 2-1 includes the revised list of COCs. Whereas no reference is given for Table 2-2 that appears to give FRLs for only a portion of the "revised COCs." This type of error and inconsistency in a document creates significant problems when DOE is requesting expedited reviews. Additional attention to document quality is necessary.

Response: The two tables were inserted incorrectly and also referenced improperly.

Action: For clarity, these sentences will be revised to state the following:

"Table 2-1 identifies the preliminary list of COCs for Area 2 Phase II, Subarea 3 that was utilized during the predesign investigation. However, based on the results of the predesign sampling and analysis, which demonstrate that the majority of the predesign secondary COCs were not detected above their respective FRLs, a revised list of COCs was developed and is presented in Table 2-2 for excavation control purposes."

Accordingly, these two referenced tables will be inserted correctly.

6. Commenting Organization: Ohio EPA Commenter: OFFO
Section #: 2.4 Pg #: 2-4 Line #: Code: C
Original Comment #: 6

Comment: This section provides no justification for the reduction in COCs. Based upon Ohio EPA's review of the data package and the lack of justification within the text, all COCs from the predesign PSP should be carried forward into certification.

Response: The last sentence of Section 2.4 (Page 2-4, Lines 25 and 26) and the revised text as stated in the Response to Comment #5 above, presents the justification for the revised ASCOC list for excavation control purposes. The revised list presents the analytes that were detected above the FRLs and will therefore drive the excavation. The revised list also includes the remainder of the sitewide primary COCs as these primary COCs are always carried through the remediation/certification process. These lists do not necessarily reflect the final certification approach after excavation, which may include additional COCs.

As always, the rationale for retaining/eliminating ASCOCs for certification will be presented in the area specific Certification Design Letter that will be submitted for your review and approval

Action: None.

7. Commenting Organization: Ohio EPA Commenter: OFFO
Section #: 2.5.2 Pg #: 2-5 Line #: 4-11 Code: C
Original Comment #: 7

Comment: This paragraph states that the above-FRL conditions have been bound at 2.5 feet along the road, however, two sample locations (Sub 1 and Sub 2) are restricted (due to the SWRB) if further bounding is necessary. Obviously additional bounding is needed in order to ensure the excavation and soon to be certified portions will not be recontaminated by residual PCBs. If as suggested in the text DOE does not intend to excavation outside the roadbed, additional predesign PCB sampling is necessary within the area between the roadbed and the SWRB.

Response: DOE intends to excavate the roadbed as well as remove the gravel throughout the entirety of the project area. As such, PCB excavation control samples will be taken when necessary as described in the response to comment #4 not only in the road-bed to ensure the PCB contamination was removed at depth but along both sides of the roadway to ensure that the remediation effectively removed the contamination to its lateral extent.

This approach is defined in Table 2-3 of the Project Specific Plan for the Excavation Control of Area 2, Phase II – Subarea 3 (Supplement to 20300-PSP-0011) that was submitted along with this addendum to the Implementation Plan.

Action: The Project Specific Plan for the Excavation Control of Area 2, Phase II – Subarea 3 (Supplement to 20300-PSP-0011) will be revised to include investigating areas of discolored soil for PCB contamination.

8. Commenting Organization: Ohio EPA Commenter: OFFO
Section #: Figure 2-2 Pg #: Line #: Code: C
Original Comment #: 8

Comment: This figure is misleading in that it suggests the area being addressed in the document includes areas east of the roadbed. Whereas based upon discussions with Fluor Fernald, it is our understanding that the drawings in the appendix actually define the scope of the document. In order to facilitate expedited reviews of documents, it is essential that DOE provide clear graphical representations of the work areas being addressed. Such clarity should not be relegated to the appendices of a document. With DOE's continued subdividing of project areas into smaller and smaller pieces, the need for clear figures and defined boundaries becomes even

Action: The first sentence of the second paragraph in Section 3.3 will be modified as follows:

“After the certification samples have been taken and real-time monitoring confirms that no more soil needs to be removed, deeper excavations within the excavation area will be backfill and a gravel roadway will be reestablished where the previous paved roadway was removed.”

**RESPONSES TO
U. S. ENVIRONMENTAL PROTECTION AGENCY AND
OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE DRAFT PROJECT SPECIFIC PLAN
FOR THE EXCAVATION CONTROL
OF AREA 2, PHASE II – SUBAREA 3
(Supplemental to 20300-PSP-0011)**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

DECEMBER 2004

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE DRAFT PROJECT SPECIFIC PLAN FOR THE EXCAVATION CONTROL
OF AREA 2, PHASE II – SUBAREA 3 (Supplemental to 20300-PSP-0011)
(20450-PSP-0006, Revision A)**

SPECIFIC COMMENTS

1. Commenting Organization: U.S. EPA
Section #: 1.2 Pg #: 1-1 Commenter: Saric
Original Specific Comment #: 1 Lines #: 20 through 23

Comment: The text states that the Infrastructure Area consists of four components (Trailer Complex Area, Equipment Wash Facility, Subcontractor Laydown Area, and Aquifer Project Laydown Area). The Implementation Plan for A2PII - Subarea 3 states that there are six components for A2PII - Subarea 3. The text should be revised to state why (1) the ditch and the bank north of the former Active Flyash Pile and (2) the portion of the Impacted Material Haul Road (IMHR) and nearby former footprint of debris pile MTL-HRD-012 were not included as components in the Project Specific Plan (PSP) for Excavation Control of Area 2, Phase II - Subarea 3. Also, all components of Subarea 3 should be shown on Figure 1-1.

Response: The ditch and bank north of the former Active Flyash Pile were included as part of the Aquifer Project Laydown Area.

Due to the need to utilize the IMHR in support of the Silos Project, certification was moved forward under separate documentation. This was addressed in the Certification Design Letter (CDL) for Area 2, Phase II (A2PII) - Subarea 3 Impacted Material Haul Road, document 24050-RP-0007.

MTL-HRD-012 was certified during the certification of A2PII - Subareas 1, 2, and 4 and was removed from Subarea 3 at that time. The footprint of this former debris pile was identified as CU-A2P2-45 in the Certification Report for A2PII Subareas 1, 2, and 4, document 20450-RP-0006.

While Figure 1-1 does contain all of the areas in A2PII - Subarea 3, it will be amended such that the legend and the map will denote the areas within Subarea 3 to be affected by this Excavation Control PSP and those within Subarea 3 which have been/will be addressed in separate documentation.

Action: Figure 1-1 will be amended such that the legend and the map will denote the areas within Subarea 3 that will be affected by this Excavation Control PSP as well as the areas within Subarea 3 that have been/will be addressed in separate documentation.

2. Commenting Organization: U.S. EPA
Section #: 2.1.1 Pg #: 2-1 Commenter: Saric
Original Specific Comment #: 2 Lines #: 15 through 18

Comment: As stated in Specific Comment 1, the text states that the Infrastructure Area consists of four components (Trailer Complex Area, Equipment Wash Facility, Subcontractor Laydown Area, and Aquifer Project Laydown Area). The Implementation Plan for A2PII - Subarea 3 states that there are six components for A2PII - Subarea 3. The text should be revised to state why (1) the ditch and bank north of the former Active Flyash Pile and (2) the portion of the IMHR and nearby former footprint of debris pile MTL-HRD-012 were not included as components in the PSP for Excavation Control of Area 2, Phase II - Subarea 3. Also, all components of Subarea 3 should be shown on Figure 1-1.

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Response: See the Response to U.S. EPA Comment #1

Action: See the Action to U.S. EPA Comment #1.

3. Commenting Organization: U.S. EPA
Section #: 2.1.2.1
Original Specific Comment #: 3
- Commenter: Saric
Lines #: 32 and 33
- Pg #: 2-1

Comment: The text lists radium-226 as the primary constituent of concern (COC) and aroclor-1254 and arsenic as the secondary COCs. However, in the Implementation Plan for A2PII - Subarea 3 also lists radium-228, thorium-228, thorium-232, and total uranium as primary COCs. The text should be revised to include radium-228, thorium-228, thorium-232, and total uranium as primary COCs or explain why they were not included in the PSP for Excavation Control of Area 2, Phase II - Subarea 3.

Response: The COCs proposed here are for a more efficient excavation control and are not intended to be the final list used for the certification effort. This is why radium-228, thorium-228, thorium-232, and total uranium are not present in this plan. The COCs listed are the constituents that drive the excavation and will need further sampling to demonstrate that the area is ready for precertification and CDL development. This same approach of short listing COCs for excavation control purposes has been used to control the above-waste acceptance criteria (WAC) and above-final remediation level (FRL) excavations throughout the Former Production Areas (Areas 3A/4A and 3B/4B/5) as well as the portions of Area 6 that have undergone excavation (OU1 Stockpile Area). A longer list of COCs is usually developed in the CDL and then used during the certification.

The rationale for retaining/eliminating area-specific COCs for certification will be presented in the area-specific CDL that will be submitted for your review and approval. The list presented in this Excavation Control PSP does not reflect the final certification approach.

Further, it should be noted that in response to comments from the Ohio EPA, this Excavation Control Plan is being amended to only include the Equipment Wash Facility and the Subcontractor Laydown Area. The Trailer Complex Area, Aquifer Laydown Area, etc. will be excluded from this document. A separate Excavation Control PSP will be submitted for these areas along with the respective Implementation Plan for you review and approval. This will have a net result of removing radium-226 from this document as a COC.

Action: Remove all references to the inclusion of the Trailer Complex Area, Aquifer Laydown Area, etc. from this PSP.

4. Commenting Organization: U.S. EPA
Table #: 2-1
Original Specific Comment #: 4
- Commenter: Saric
Line #: 3
- Pg #: 2-4
- Comment: Table 2-2 lists aroclor-1254 and arsenic as Area 2 COCs. Table 2-1 should be revised to include radium-226, radium-228, thorium-228, thorium-232, and total uranium as COCs.

Response: See the Response to U.S. EPA Comment #3.

Action: See the Action to U.S. EPA Comment #3.

