



## Department of Energy

Ohio Field Office  
Fernald Closure Project  
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Springdale, Ohio 45246  
(513) 648-3155



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SEP 16 2005

Mr. James A. Saric, Remedial Project Manager  
United States Environmental Protection Agency  
Region V-SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0331-05

Mr. Thomas Schneider, Project Manager  
Ohio Environmental Protection Agency  
Southwest District Office  
401 East Fifth Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

### **RESPONSE TO OHIO ENVIRONMENTAL PROTECTION AGENCY DISAPPROVAL OF THE REVISED PROTOCOL FOR REAL-TIME HOTSPOT ASSESSMENT**

- References:
- 1) Letter DOE-0309-05, W. Taylor to J. Saric and T. Schneider, "Revised Protocol for Real-Time Hotspot Assessment," dated August 24, 2005
  - 2) Letter, T. Schneider to W. Taylor, "Disapproval - Revised Real-Time Hot Spot Protocol," dated September 6, 2005

In Letter DOE-0309-05 dated August 24, 2005, the Fernald Closure Project (FCP) requested approval from the U.S. Environmental Protection Agency (EPA) and Ohio Environmental Protection Agency (OEPA) for a revised protocol for confirming and delineating potential hotspots identified by mobile sodium iodide (NaI) measurements in the Waste Pits. As noted in Reference 2, OEPA withheld approval of the revised hotspot protocol. In a subsequent telephone conversation between Mr. Thomas Schneider of the OEPA and Mr. Jyh-Dong Chiou of Fluor Fernald Inc., OEPA clarified the reasons for its disapproval to the proposed hotspot protocol. The purpose of this letter is to clearly state what the FCP hotspot protocol will be, in light of OEPA's disapproval of the earlier proposal.

From now on, the FCP hotspot evaluation protocol will be as follows:

For purposes of this discussion, a hotspot is defined as any single NaI or high purity germanium (HPGe) detector measurement result that exceeds three times the final remediation level (3xFRL) for radium-226, thorium-232 or total uranium. All locations where NaI measurements indicate the presence of potential hotspots will either be confirmed and delineated by HPGe measurements, or they will be excavated without confirmation. The FCP reserves the option to excavate without HPGe confirmation of individual NaI results in situations where multiple NaI results define a contiguous area. The contiguous area boundaries for excavation will be defined by HPGe measurements, although HPGe will not necessarily be used to delineate individual NaI hotspot results within these boundaries where excavation will be conducted. Only if NaI hotspot locations are confirmed by follow-up HPGe measurements to be below 3xFRL will that soil be left in place.

If there are any questions concerning this information, please contact Johnny Reising at (513) 648-3139.

Sincerely,



William J. Taylor  
Director

FCP:Reising

cc:

J. Reising, OH/FCP  
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AR Coordinator, Fluor Fernald, Inc./MS78  
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