

R-009-207.22

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**APPROVAL OF THE REVISED WORK PLAN FOR
THE SOUTH GROUNDWATER CONTAMINATION
PLUME REMOVAL ACTION - PART 5**

08/04/91

OEPA/DOE-FSO

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LETTER

OU5



State of Ohio Environmental Protection Agency

Southwest District Office

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Original File Copy

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George V. Voinovich
Governor

September 4, 1991

Mr. Jack Craig
U.S. DOE-FMPC
P.O. Box 398705
Cincinnati, Ohio 45239

Date Rec'd SEP 05 1991
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Dear Mr. Craig:

2052
The purpose of this letter is to conditionally approve the Revised Work Plan for the South Groundwater Contamination Plume Removal Action-Part 5. The conditions are that DOE explain to Ohio EPA's satisfaction the following comments.

- 1) Response to Ohio EPA Comment #6 (Pump Tests): Although it is not ideal Ohio EPA agrees to allow DOE to proceed at their own risk with design and construction of the well field without the suggested pump test. However, if the situation arises where the goals of the removal action are not being achieved after construction and start up, DOE will have to make whatever additions or modifications are necessary to meet these goals.
- 2) Ohio EPA shall review the start-up and operation and maintenance manual for this removal action. Under the proposed revised schedule, when will this manual be submitted to Ohio EPA for review and comment?
- 3) Table 3, Page 9: DOE should either add or justify excluding the following wells/piezometers to those to be sampled: 2540, 3062, and 3689. As shown on Figure 2, 3062 and 3689 appear to be directly upgradient of the extraction wells and could provide important data concerning uranium concentrations immediately captured by the wells. It would appear from Figure 2 that 2450 may provide data useful in determining the 30 ug/l and 20 ug/l isopleths.
- 4) Groundwater Modeling, Page 13, Bullets: An additional objective for the groundwater modeling, as stated in previous Ohio EPA comments, should be to predict effects (not just minimize impacts) the extraction wells will have on the Albright & Wilson and Rutger Nease groundwater contamination plumes. 1
- 5) Groundwater Modeling, Page 13, Number 2: What information (field data, bench studies, literature values, etc.) resulted in DOE using the uranium retardation valve of 12?

Mr. Jack Craig
U.S. DOE-FMPC
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If you have any questions about these conditions please contact me.

Sincerely,



Graham E. Mitchell
Project Manager

GEM/acn

cc: Kathy Davidson, Ohio EPA
Jim Saric, U.S. EPA
Lisa August, GeoTrans
Ed Schuessler, PRC, Inc.
Robert Owen, ODH