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**APPROVAL OF THE SOUTH PLUME REMOVAL
ACTION GROUNDWATER MODELING REPORT
RESPONSES TO COMMENTS**

10/21/92

USEPA/DOE-FN

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LETTER

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:

Mr. Jack R. Craig
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

HRE-8J

RE: Approval of the South Plume
Removal Action Groundwater
Modeling Report Response to
Comments

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the South Plume Removal Action Groundwater Modeling Report Response to Comments (RTC). The (RTC) adequately addressed the majority of U.S. EPA's comments, but failed to mention when the results of this modeling effort would be submitted to U.S. EPA.

U.S. EPA hereby approves the RTC pending incorporation of the attached comments.

Please contact me at (312/FTS) 886-0992 if you have any questions.

Sincerely,

James A. Saric
Remedial Project Manager

Enclosure

cc: Graham Mitchell, OEPA-SWDO
Pat Whitfield, U.S. DOE-HDQ
Dennis Carr, WMCO

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bcc w/o attachments:

William Muno->Norm Niedergang->Kevin Pierard, WMD
Cheryl Allen, OPA
Brian Barwick, ORC

bcc w/attachments:

Tom Hahne, PRC
Larry Jensen, ARD

**SOUTH PLUME REMOVAL ACTION GROUND-WATER MODELLING REPORT
COMMENTS ON DEPARTMENT OF ENERGY (DOE) RESPONSE TO
ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS**

1. DOE acknowledges the general lack of certainty in the contaminant transport model and states that placement of wells and pumping rates were predominantly based on the particle tracking efforts. EPA believes (as stated in its original comments) that the particle tracking results are based on a ground-water flow model that is not adequately calibrated. EPA does believe that the current well configuration and design are adequate and that the monitoring and evaluation program is sufficient in scope to initiate the South Plume removal action. However, for the model to support future decision making or modifications of the removal or remedial extraction system, additional work should be completed. The work should include further refinement of the ground-water flow model grid and additional calibration efforts.
2. In several responses, DOE refers to efforts to refine the model grid and recalibrate the ground-water flow model. The revised ground-water modeling report should specify when these efforts will be completed and propose a specific date for submitting the results of this modelling effort to EPA.
3. DOE's response to previously issued EPA Comment No.2 deals with the calibration of the contaminant transport model, whereas the EPA comment refers specifically to the calibration of the ground-water flow model. EPA believes that DOE failed to specifically address Comment No. 2 in its response and should address it in the revised Ground-Water Modeling Report.