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OHIO EPA COMMENTS ON THE OU 5 WORK PLAN ADDENDUM FOR THE OUTFALL LINE

11/25/92

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LETTER

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George V. Voinovich
Governor

November 25, 1992

Mr. Jack R. Craig
Project Manager
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, Ohio 45239

Dear Mr. Craig:

Listed below are Ohio EPA comments on the O.U. 5 Work Plan Addendum for the Outfall Line:

General Comments

1. From the limited work proposed within the addendum it is unclear how DOE intends to characterize the contamination and its source. The installation of one monitoring well will not determine whether the outfall line or "a plume moving east from the production area" is the source.

2. DOE should expand the scope of the investigation via the use of more hydropunching and/or the installation of additional piezometers and/or monitoring wells. DOE should attempt to answer the existing data gaps during this investigation and not put them off, potentially delaying the RI.

3. It is not clear whether all available data have been incorporated into this work plan. Data from the STP Incinerator Soils RA and the EWMF Sampling Plan should be reviewed for additional information. Additionally, the RCRA program had proposed some perimeter wells in the area of the STP, which should be reviewed.

Specific Comments

1. Figure 1: The figure is hard to read and should be larger providing more detail as to the location of the STP and any additional monitoring wells.

2. Page 1, Paragraph 2: It should be more appropriate for DOE to assign the value of .5 ppb to the BDL's instead of 0.

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3. Section 3.0: DOE fails to state whether monitoring well 2067 has been sampled for anything other than total uranium. If the well has not been sampled for full HSL and Rads, then such sampling must be included in this work plan.

4. Section 4.0: If monitoring well 2067 is being sampled quarterly, DOE must include data more recent than 1990. Almost two years of additional data should be available for both water levels and contaminants.

5. Section 4.1: Two Section 4.1's exist. Please correct.

6. Section 4.1: DOE should consider the installation of piezometers for the determination of ground water flow direction as well as sampling for total uranium and other radionuclides.

7. Section 4.1: a) DOE should discuss the expected total depth of the boring and the expected depth of the monitoring well screen. b) DOE should expand the scope of hydropunching to determine the areal extent of contamination.

8. Page 5, Paragraph 3: This paragraph indicates that ground water flow is exclusively west to east; however, the Revised Work Plan addendum for additional monitoring wells for OU5 (November 20, 1992) indicates that the ground water flow is east to west near the Great Miami River. This should be clarified.

9. Page 5, Paragraph 5: This monitoring well will not be down gradient in times of flow reversal. (See Comment #8)

10. Page 5, Paragraph 5: The DOE should identify the wells to be used for the upgradient comparison.

11. Page 5, Paragraph 5: The DOE does not give sufficient justification for the installation of a single monitoring well. If flow directions in this area shift, then it would be prudent to install more than one monitoring well.

If you have any questions about these comments, please contact Tom Schneider or me.

Sincerely,

Graham E. Mitchell
Project Manager

GEM/acp

cc: Jenifer Kwasniewski, DERR, CO
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