

4584

**OHIO EPA COMMENTS ON THE GROUND  
WATER AND SURFACE WATER BACKGROUND  
STUDY**

**06/30/93**

**OEPA/DOE-FN**

**4**

**COMMENTS**

**OU5**



State of Ohio Environmental Protection Agency

Southwest District Office

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LOG  
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67-04525  
A.R.

4584

George V. Voinovich  
Governor

June 30, 1993

Mr. Jack R. Craig  
Project Manager  
U.S. DOE FEMP  
P. O. BOX 398705  
Cincinnati, Ohio 45239-8705

Dear Mr. Craig:

Attached are Ohio EPA comments on the Ground Water and Surface Water Background Study. If you have questions about these comments please contact Mike Proffitt or me.

Sincerely,

Graham E. Mitchell  
Project Manager

GEM/bjb

- cc: Jenifer Kwasniewski, DERR
- Tom Schneider, DERR
- Mike Proffitt, DDAGW
- Jim Saric, U.S. EPA
- Dennis Carr, FERMCO
- Lisa August, GeoTrans
- Jean Michaels, PRC
- Robert Owen, ODH

(VERACE/P)  
ACTION RESPONSE  
to DOE-1871-93  
(U216)

OHIO EPA COMMENTS - BACKGROUND

- 1) ~~Commenting Organization: Ohio EPA~~ Commentor: M. Proffitt  
Section #: 3.1.2 Pg #: 3-2 Line #: 6 Code:  
Original Comment #:  
Comment: West of the FEMP should be changed to West of Paddy's Run.  
West of the FEMP is not outside of the influence of the facility,  
whereas, west of Paddy's Run is.  
  
Response:  
  
Action:
  
- 2) Commenting Organization: Ohio EPA Commentor: M. Proffitt  
Section #: 3.1.2 Pg #: 3-2 Line #: 14 Code:  
Original Comment #:  
Comment: What evidence technically supports the decision to use these  
wells?  
  
Response:  
  
Action:
  
- 3) Commenting Organization: Ohio EPA Commentor: M. Proffitt  
Section #: 3.1.2 Pg #: 3-2 Line #: 27 Code:  
Original Comment #:  
Comment: Were these logs verified using field measurements?  
  
Response:  
  
Action:
  
- 4) Commenting Organization: Ohio EPA Commentor: M. Proffitt  
Section #: Table 1 Pg #: 3-3 Line #: Code:  
Original Comment #:  
Comment: Which wells were excluded due to construction problems? How  
was construction tested and verified?  
  
Response:  
  
Action:
  
- 5) Commenting Organization: Ohio EPA Commentor: M. Proffitt  
Section #: 3.1.2 Pg #: 3-8 Line #: 14-23 Code:  
Original Comment #:  
Comment: Wells with an unknown screened interval should not be used  
in the background study.  
  
Response:  
  
Action:

6) Commenting Organization: Ohio EPA            Commentor: M. Proffitt  
 Section #: 3.1.2    Pg #: 3-11    Line #: 9    Code:  
 Original Comment #:  
 Comment: Which monitoring wells did not have sufficient Ion/Anion data? How were monitoring wells lacking sufficient Ion/Anion data tested in order to determine if the water quality data obtained from these wells was indeed representative of background water quality?

Response:

Action:

7) Commenting Organization: Ohio EPA            Commentor: M. Proffitt  
 Section #: 3.1.2    Pg #: 3-11    Line #:    Code:  
 Original Comment #:  
 Comment: How were below detection limit (BDL) concentrations used in the calculations of trilinear diagrams?

Response:

Action:

8) Commenting Organization: Ohio EPA            Commentor: M. Proffitt  
 Section #: 3.1.2    Pg #: 3-14    Line #: 10    Code:  
 Original Comment #:  
 Comment: If records do not indicate where and how the sample was taken, then the results should not be used. Field records should clearly indicate whether or not a sample has passed through a water softener. If these records do not exist the water quality data should be excluded from this investigation.

Response:

Action:

9) Commenting Organization: Ohio EPA            Commentor: M. Proffitt  
 Section #: 3.1.2    Pg #: 3-14    Line #: 26    Code:  
 Original Comment #:  
 Comment: The line "Samples collected for metals..." should read "Samples collected for dissolved metals..."

Response:

Action:

- 10) Commenting Organization: Ohio EPA Commentor: M. Proffitt  
Section #: 4.2.2 Pg #: 4-2 Line #: 14 Code:  
Original Comment #:  
Comment: Was only data discarded or were the wells eliminated from the study? If the wells were kept, how were they plotted on trilinear diagrams? High detection limits could influence where the ground water quality data is plotted on the diagram, depending upon how the BDL's are handled.

Response:

Action:

- 11) Commenting Organization: Ohio EPA Commentor: M. Proffitt  
Section #: 4.2.3 Pg #: 4-4 Line #: 3-4 Code:  
Original Comment #:  
Comment: What guidance was this based upon?

Response:

Action: