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TRANSMITTAL OF GROUNDWATER MONITORING PLAN AND DISCUSSION OF RCRA/CERCLA INTEGRATION (ENCLOSURES IN AR AS G-000-102.67 & G-000-102.68)

12/20/91

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LETTER

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**Department of Energy**
**Fernald Environmental Management Project**
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DOE-549-92

Mr. James A. Saric, Remedial Project Director
U. S. Environmental Protection Agency
Region V - 5HR-12
230 South Dearborn Street
Chicago, Illinois 60604

Mr. Graham E. Mitchell, DOE Coordinator
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402-2086

Dear Mr. Saric and Mr. Mitchell:

Reference: Letter, G. W. Westerbeck to P. Pardi, "Schedules For Implementing Hazardous Waste Requirements For Newly Determined Hazardous Waste Management Units," dated August 27, 1991

On August 27, 1991, schedules for the implementation of hazardous waste requirements for newly identified Hazardous Waste Management Units (HWMUs) were transmitted to the Ohio EPA (Reference). In accordance with those schedules, a plan describing a groundwater monitoring program for the identified regulated units is to be provided to the Ohio EPA. Enclosed, for your review, is the Resource Conservation and Recovery Act (RCRA) Groundwater Monitoring Plan (GMP).

As discussed during the September 5, 1991, meeting between representatives of the Ohio Environmental Protection Agency (Ohio EPA), United States Environmental Protection Agency (U.S. EPA), Department of Energy (DOE) and Westinghouse Environmental Management Company of Ohio (WEMCO), the Fernald Environmental Management Project (FEMP) is striving to integrate RCRA regulatory requirements with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) investigation and remediation activities. The RCRA Groundwater Monitoring Plan represents an integrated approach to sitewide monitoring. As presented at the September 5, 1991, meeting, two Waste Management Areas (WMAs) have been identified which encompass numerous potential contaminant sources including HWMUs and Solid Waste Management Units (SWMUs). Groundwater monitoring is proposed along the downgradient boundaries of these WMAs, as well as along the downgradient facility property boundary.

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The proposed program provides a technically sound approach to groundwater monitoring; however, in the interest of RCRA/CERCLA integration, the program differs from a typical RCRA monitoring program as described in the regulations and guidance. The proposed plan does not include plans for the direct determination of rate and extent of contaminant migration, but defers that determination to the CERCLA Program. Additionally, monitoring wells are not immediately adjacent to the HWMU; instead, they are located at the boundary of the Waste Management Area containing the grouped units. The FEMP asks that if this program is acceptable to the U.S. EPA and Ohio EPA, future evaluations of the RCRA Monitoring Program will be based on the objectives of the integrated monitoring program.

Although it is the FEMP's intention that the GMP will replace the Groundwater Quality Assessment Program Plan (GQAPP) for Waste Pit 4, deficiencies in the Waste Pit 4 Assessment Program were identified in a complaint order against WEMCO by the U.S. EPA. WEMCO has made efforts to resolve these issues; however, a few of these issues will need resolution upon implementation of the RCRA GMP:

1. The complaint order required WEMCO to follow the RCRA process for monitoring and defining the rate and extent of contaminant migration from Pit 4. As described below, the RCRA GMP will defer the determination of rate and extent of contaminant migration to the CERCLA process.

   The GMP proposes additional wells downgradient of the WMAs, as well as downgradient wells along the facility property boundary, which will help to determine the extent of contamination from the WMAs. This expansion of the existing network, along with additional Remedial Investigation (RI) activities under CERCLA, will help ensure the RCRA requirement of determination of rate and extent is met.

2. The complaint order required monitoring wells immediately adjacent to the HWMU (Pit 4). The RCRA GMP proposes monitoring around Waste Management Areas that are comprised of numerous potential contaminant sources, instead of monitoring immediately adjacent to the HWMUs.

   This alternative groundwater monitoring approach is allowed under existing RCRA regulations. Since the entire WMA will be remediated under the CERCLA process, there is little benefit in siting wells adjacent to each potential source of contamination. Any contamination leaving the WMA will pass the proposed lines of monitoring wells, which are screened to detect contaminants in all levels of the aquifer.

   If there are contaminants present in the till, either they will be attenuated in the clay zones or will have migrated down into the sand and gravel aquifer. GMP monitoring of the till as well as the sand and gravel aquifers should detect contaminants migrating beyond the WMAs. Residual contamination in the till inside the WMAs will be remediated under the CERCLA process.

Resolution of these issues would eliminate the necessity to conduct two overlapping programs. U.S. EPA comment or approval of the GMP is requested to avoid the potential for duplication of effort.

The FEMP is moving forward with the RCRA GMP, and will proceed with the process of installing the new wells required for the facility boundary network identified in the RCRA GMP. Monitoring of the existing wells identified in the RCRA GMP will begin during the first quarter of 1992. The DOE/Fernald Office would appreciate your response to this plan as soon as possible.

If you or your staff have any questions, please contact Ed Skintik at (513) 738-6660.

Sincerely,

R.E. Tiller

R. E. Tiller
Manager

FO:Skintik

Enclosures: As Stated

cc w/encl.:

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