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**COMMENTS - SOUTH PLUM DMEPP REPORT**

05/22/95

OEPA            DOE-FN  
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COMMENTS



State of Ohio Environmental Protection Agency

Southwest District Office

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MAY 23 10 53 AM '95

George V. Voinovich  
Governor

May 22, 1995

RE: DOE FEMP  
MSL #531-0297  
HAMILTON COUNTY  
COMMENTS - SP DMEPP REPORT

Mr. Jack Craig  
Director  
U.S. DOE FEMP  
P.O. Box 398705  
Cincinnati, OH 45329-8705

Dear Mr. Craig:

Ohio EPA has reviewed DOE's "South Plume Groundwater Recovery System Design, Monitoring, and Evaluation Program Plan Reporting Period: March 1, 1994-December 31, 1994" submitted to Ohio EPA on April 3, 1995. Ohio EPA's comments on the referenced document are attached.

Ohio EPA has substantial concerns with effectiveness of the South Plume Recovery System. Ohio EPA believes significant changes in the system may be necessary. We look forward to meeting with DOE to resolve the attached comments and discuss possible changes to the groundwater recovery system.

If you should have any questions, please contact Mike Proffitt at (513) 285-6603 or me.

Sincerely,

Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

Attachment

- cc: Jim Saric U.S. EPA
- Terry Hagén, FERMCO  
Manager TPSS, DERR/CO
- Mike Proffitt, DDAGW
- Sharon McLellan, PRC
- Lisa August, GeoTrans

Ruth Vandegrift, ODH

RESPONSE  
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OHIO EPA COMMENTS  
ON  
SOUTH PLUME DMEPP

- 1) Commenting Organization: Ohio EPA                      Commentor: DDAGW  
Section #: Executive Summary      Pg #: E-1      Line #: Para 3      Code:  
Original Comment #:  
Comment: This paragraph indicates that the As levels increase for any change to the pumping system. This should be revised to indicate that As levels increase as the pumping rate for the recovery system is increased.  
Response:  
Action:

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- 2) Commenting Organization: Ohio EPA                      Commentor: DDAGW  
Section #: 3.1.1      Pg #:      Line #:      Code:  
Original Comment #:  
Comment: Ground water data for monitoring wells 3062, 2396, 3396, 2552, 3689, 3552, 2553, 2546 are not included in this report. These monitoring wells are located so that they may provide important information as to plume properties southwest of the recovery system. This data should be incorporated in the analysis.  
Response:  
Action:
- 3) Commenting Organization: Ohio EPA                      Commentor: DDAGW  
Section #: 3.1.1      Pg #: Figure 3.1.2      Line #:      Code:  
Original Comment #:  
Comment: Monitoring well 3125 is drawn between the 20 ppb and the 5 ppb contours when in fact it should be well within the 50 ppb contour. The average 1994 uranium concentration for this well is reported as 60.4 ppb.  
Response:  
Action:
- 4) Commenting Organization: Ohio EPA                      Commentor: DDAGW  
Section #: 3.1.1      Pg #: Figure 3.1.2      Line #:      Code:  
Original Comment #:  
Comment: Monitoring well 2624 is drawn between the 20 ppb and the 50 ppb contours. The average 1994 uranium concentration for this well is reported as 65.25 ppb. The contours should be redrawn to include 2624 in the 50 ppb contour.  
Response:  
Action:
- 5) Commenting Organization: Ohio EPA                      Commentor: DDAGW  
Section #: 3.1.1      Pg #: Figure 3.1.2      Line #:      Code:  
Original Comment #:  
Comment: The average 1994 uranium concentration for monitoring well 2095 is reported as 170.0 ppb. This indicates that the 200 ppb contour around 2061 is not as isolated as shown on the map. The 200

Ohio EPA Comments  
May 22, 1995  
Page 3

Response:  
Action:

- 9) Commenting Organization: Ohio EPA Commentor: DDAGW  
Section #: 3.1.4 Pg #: General Line #: Code:  
Original Comment #:  
Comment: Tables 3.1-2 and 3.1-3 DMEPP Statistical Summary show values reported to one thousandth of a part per billion or to the part per trillion. FEMP analytical methods do not allow accuracy to this degree. The table should be adjusted accordingly.  
Response:

Action:

- 9) Commenting Organization: Ohio EPA Commentor: DDAGW  
Section #: 3.1.4 Pg #: 3-12 Line #: para 1 Code:  
Original Comment #:  
Comment: This paragraph omits monitoring wells 2552 and 3552 which show an increase in uranium concentration in figure 3.1-3.  
Response:

Action:

- 10) Commenting Organization: Ohio EPA Commentor: DDAGW  
Section #: 4.0 Pg #: para 3 Line #: Code:  
Original Comment #:  
Comment: Sampling results do not show that the system is meeting the overall project objective of capture of the uranium plume. The Ohio EPA has identified data gaps which exist in the southwestern portion of the projected plume that are not satisfied by this report. This report shows that additional data is needed for this area and that an additional production well will probably be warranted west southwest of production well 3924. Production wells 3926, 3927, and 3928 are removing ground water with uranium concentrations that are near background. These wells do not appear to be useful and should be shut down.  
Response:

Action: