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U-007-305.88

DISAPPROVAL - PSP SOUTHFIELD EXTRACTION SYSTEM

06/07/95

OEPA DOE-FN
3
COMMENTS



State of Ohio Environmental Protection Agency

Southwest District Office

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I-2640
JUN 9 10 37 AM '95

George V. Voinovich
Governor

June 7, 1995

RE: DOE FEMP
MSL 531-0297
DISAPPROVAL - PSP
SOUTHFIELD EXTRACTION SYSTEM

Mr. Jack Craig
Project Manager
US DOE FEMP
P. O. Box 398705
Cincinnati, OH 45239-8705

Dear Mr. Craig:

Ohio EPA has reviewed DOE's "Project Specific Plan for the Installation of the South Field Extraction System" submitted on May 19, 1995. Ohio EPA has significant concerns with the scope and goals of the plan.

The DOE has performed a pumping test in the area of the proposed system. It is our understanding that data evaluation is not completed at this time. In order to design an adequate system, while minimizing the overall cost, it is imperative that this data be analyzed and the system be designed based upon this site specific data. The current south plume extraction system was designed without the use of site specific data, resulting in the installation of an inefficient system. We believe it is in Ohio EPA's and DOE's best interest to avoid repeating this kind of costly mistake.

Ohio EP is sensitive to the need to move forward on the project in an expeditious manner so that available funding may be utilized. However, we have many general questions regarding the placement of wells, the construction materials, incorporation of the well placement in a hydraulic push-pull system, and the over-all incorporation of the PSP into the final OU5 remedy. As always, we are available to schedule any necessary meetings to expedite the resolution of our concerns. Please contact Mike Proffitt or me if you have any questions.

Sincerely,

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

URGENT (PI)
P.P.R.I.U.
-ACTION RESPONSE
TO 5-2964
3912

Attachment

cc: Jim Saric, U.S. EPA
Terry Hagen, FERMC0

Manager, TPSS/DERR,CO
Lisa August, GeoTrans

Ruth Vandergrift, ODH
Sharon McClellan, PRC

Ohio EPA Comments
June 7, 1995
Page 2

Comment: We are unable to discern the reason(s) for the areas on the map being labeled "Area to be protected. Do not disturb. No excavation..

8) Commenting Organization: Ohio EPA Commentor: DDAGW
Section #: 4.3 Pg #: 24 Line #: 24-30 Code:
Original Comment #:

Comment: This description of ground water sampling is not clear. Does DOE intend to take samples from inside of a monitoring well using a packer and a well point, as stated in the paragraph, or will samples be taken from the bore hole, as the boring is advanced? Has a methodology for this sampling technique been defined in the QAPP?

11) Commenting Organization: Ohio EPA Commentor: TMO
Section #: 9.0 Pg #: 30 Line #: Code: c
Original Comment #:

Comment: Please provide a complete reference in this section for the document "General Methods for Remedial Operation Performance Evaluations for Pump-and-Treat Remediation". This document is referred to on page4, line 22.

Response:
Action: