



State of Ohio Environmental Protection Agency

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Bob Taft, Governor
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June 11, 2001

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

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RE: COMMENTS - URANIUM IN GROUNDWATER FRL CHANGES

Dear Mr. Reising:

Ohio EPA has reviewed DOE's February 23, 2001 submittal, "Proposed Revisions to the Groundwater Final Remediation Levels Established in the Fernald Operable Unit 5 Record of Decision" and May 7, 2001 submittal, "Explanation of Significant Differences Document- Changing the Groundwater Final Remediation Level for Uranium and Monthly Average Uranium Discharge Standard - USDO FEMP." Attached are Ohio EPA comments on the document which must be incorporated into the ESD prior to release for public comment.

Should you have any questions, please contact me at (937) 285-6466.

Sincerely,

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

cc: Jim Saric, U.S. EPA
Terry Hagen, Fluor Fernald
Mark Shupe, GeoTrans, Inc.
Francie Hodge, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

**OHIO EPA COMMENTS ON
PROPOSED REVISIONS TO GROUNDWATER FRLs &
ESD FOR URANIUM FRL**

Proposed Revisions (February 2001 Letter)

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: na Pg #: na Line #: na Code:
Original Comment #:
Comment: Though not mentioned in the subsequent ESD, this document references changing the groundwater injection limit to 30 ug/L for uranium. This change is not acceptable to Ohio EPA. We have expressed concern with previous events where reinjection water approached 20 ug/L. DOE's treatment ability clearly allows treatment to sub-1 ug/L concentrations and a primary goal of the system was mass removal. Therefore we believe it is appropriate to maintain the current re-injection standards.

2. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: na Pg #: na Line #: na Code:
Original Comment #:
Comment: As suggested in DOE's letter, Ohio EPA believes the proposed change in FRL will require a re-evaluation of previously discussed NRD groundwater settlement proposals. The proposed FRL is a 50% increase in concentration over the existing FRL and as stated in the ESD will leave considerable additional areas without treatment and with higher residual levels of contamination.

Draft ESD (May 2001)

3. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: na Pg #: na Line #: na Code:
Original Comment #:
Comment: The document should be revised to better address the process used to select the proposed MCL of 20 ug/L as the FRL. A discussion of ARAR vs. risk determination of the FRL should be included. Additionally, a section addressing the change in risk presented by the proposed revision should be included. These changes will help address obvious public concerns.