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**TREATMENT OF DISCHARGES AT THE FEMP**

03/07/96

OEPA            DOE-FN  
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COMMENTS



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street  
Dayton, Ohio 45402-2911  
(513) 285-6357  
FAX (513) 285-6249

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George V. Voinovich  
Governor

FILE: \_\_\_\_\_

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TREATMENT OF DISCHARGES  
AT THE FEMP

March 7, 1996

Mr. Johnny Reising  
U.S. DOE FEMP  
P.O. Box 398705  
Cincinnati, OH 45329-8705

Dear Mr. Reising:

Ohio EPA has reviewed the document "Implementation of Operable Unit 5 Record of Decision - Treatment of Discharges at the Fernald Environmental Management Project" submitted by DOE on February 20, 1996. Ohio EPA finds DOE's proposal to be unacceptable. Ohio EPA's concerns are outlined in the comments below.

1. The letter states that DOE will consider the ten day period for bypasses to be equivalent to 240 hours (rather than 10 occurrences) and will keep a running total based upon hours. This approach is inconsistent with DOE, USEPA and Ohio EPA discussions prior to ROD finalization. The ten days were based upon data provided by DOE concerning the number of historical overflow events per year. The letter should be revised to state bypasses will be allowed for exclusion from the 20ppb limit for ten occurrences not to exceed ten calendar days.
2. It is Ohio EPA's understanding the DOE no longer intended to issue the Monthly Progress Report referenced in the letter and that these would be issued quarterly. Please clarify.

If you should have any questions, please contact me.

Sincerely,

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

cc: Jim Saric U.S. EPA  
Terry Hagen, FERMCO  
Ruth Vandegrift, ODH  
Sharon McClellan, PRC

Manager TPSS, DERR/CO  
Dave Ward, GeoTrans  
Joe Bartoszek, DSW  
Jay Richie, DSW

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