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**DISAPPROVAL - OSDF GROUNDWATER MONITORING**

**05/16/96**

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**DISAPPROVA**



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich  
Governor

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May 16, 1996

RE: DOE FEMP  
MSL #531-0297  
DISAPPROVAL - OSDF  
GROUNDWATER MONITORING

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

Dear Mr. Reising:

Ohio EPA has reviewed DOE's "Proposed Groundwater Monitoring Strategies for the On-Site Disposal Facility" submitted on April 11, 1996. DOE's proposal to postpone the installation of a ground water monitoring system for the OSDF until the completion of regional groundwater remediation is unacceptable to Ohio EPA.

The DOE has presented evidence that the construction of the OSDF will be long term benefit to human health and the environment. The costs associated with shipping all contaminated materials off site are extremely prohibitive, and could actually cease environmental restoration activities at the site. However, it has been understood that the site is located over a sole source aquifer capable of yielding greater than 2000 gallons of water per minute. As such, DOE agreed that if Ohio EPA and US EPA would allow the construction of the landfill, they would go beyond traditional landfill technology and would be very conservative in the design, construction, and monitoring of the landfill. The DOE, USEPA, and Ohio EPA all concurred that though the site does not meet siting criteria, the overall benefit to human health and the environment outweighed the risks.

The Proposed Ground Water Monitoring Strategies For the On-Site Disposal Facility submittal is in conflict with the spirit of Ohio EPA's agreement with DOE for the construction of the OSDF. The DOE had guaranteed that they would be very conservative and protective for this project. The submittal represents a system which is completely inconsistent with the spirit of DOE's commitments to be conservatively protective. Additionally, the proposal does not even comply with the Ohio ARAR for solid waste disposal facility groundwater monitoring systems (OAC 3745-27-10).

Ohio EPA will not approve the design of the On-Site Disposal Facility prior to the submission of an acceptable groundwater monitoring system plan. Ohio EPA recommends DOE revise the monitoring plan to be in compliance with ARARs and include the revised plan in the Pre-Final

(Janke (E))  
partial action resp.  
(9632) to DOE-0721-P-0736

Mr. Johnny Reising  
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OSDF Design package.

If you 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

cc: Mike Proffitt, DDAGW  
Terry Hagen, FERMCO  
Jim Saric, USEPA  
Sharon McClellan, PRC  
Dave Ward, Geotrans  
Ruth Vandegrift, ODH  
Manager TPSS, DERR