



State of Ohio Environmental Protection Agency

Southwest District Office

L-01010

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George V. Voinovich, Governor  
Nancy P. Hollister, Lt. Governor  
Donald R. Schregardus, Director

March 9, 1998

RE: DOE FEMP 6448.3  
APPROVAL: DRAFT  
START-UP MONITORING PLAN

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

Dear Mr. Reising:

This letter provides Ohio Environmental Protection comments on the Draft Start-up Monitoring Plan for the South Field Extraction and South Plume Optimization Modules. We also concur with the proposal in your cover letter (DOE-0353-98) to modify the start-up dates for the Phase I South Field Extraction System and the Injection Demonstration so that extraction begins before injection.

If you have any questions, please contact Tom Ontko or me.

Sincerely,

*for* *Tom Ontko*

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

- cc: Jim Saric, U.S. EPA
- Terry Hagen, FDF
- Ruth Vandergrift, ODH
- Mark Shupe, HSI- GeoTrans, Inc.
- Francie Barker, Tetra Tech EM Inc.  
Manager, TPSS/DERR,CO

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Ohio Environmental Protection Agency Comments on the  
Draft Start-Up Monitoring Plan for the South Field Extraction and South Plume Optimization  
Modules

- 1) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 3.4    Pg #: 22    Line #:                      Code: c  
Comment: This section is not entirely clear on the number and location of the direct push sampling. It sounds like seven direct push holes will be sunk prior to start-up in the seven locations depicted in Figure 3-1. Then during re-injection three locations will be revisited (described on page 23 lines 4 thru 11) and sampled quarterly. Then all seven locations will be re-visited after the Re-Injection Demo (page 23, lines 15).  
Question one                      When will vertical profiling be done? During the original push only or also during the subsequent revisits?  
Question two                      Will the "wells" be installed during the first push and then sampled during the revisits or will the locations be revisited and an entirely new "push" be completed?
- 2) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 3-4                      Pg #: 21    Line #:                      Code: general  
Comment: Section 3.5.1.3 of the IEMP commits to measuring water quality in nine RCRA boundary monitoring wells and five of the South Plume monitoring wells prior to start-up of the Injection Demonstration Module. The data collected will be "used to document pre-injection plume conditions in the Injection demonstration area." The Start-Up Monitoring Plan does not mention this activity or any follow-up sampling of these fourteen wells. Water quality monitoring in this Plan is limited to the extraction well and the seven direct push wells. Explain how sampling done for the IEMP will be integrated with sampling done for this plan.
- 3) Commenting Organization: OEPA                      Commentor: HSI GeoTrans, Inc.  
Section #: 4.0                      Pg. #33:                      Line #21-31                      Code: C  
Comment: The discussion of long term capture suggests that well extraction rates will not be adjusted by FEMP unless several quarters of water level data consistently show that capture is not being achieved. If there is any indication at any time that capture is not being achieved, FEMP should use other means to verify groundwater flow directions (e.g., colloidal borescope readings) and should adjust extraction rates accordingly in timely fashion. In addition, FEMP should avoid use of the term "net plume capture." The discussion should, rather, indicate that capture will be re-established when it is verified that capture has not been achieved.
- 4) Commenting Organization: OEPA                      Commentor: HSI GeoTrans, Inc.

Ohio EPA comments  
Draft Start-up monitoring Plan  
March 9, 1998

Section #:4.0           Pg. #: 34                   Line # 25                   Code: C

Comment: The text should provide a discussion of how the data will be utilized to assess the need for RW-8. Reiterating the five bulleted "triggers" in Section 5.4.6 of the Baseline Remedial Strategy Report would be sufficient.

5)   Commenting Organization: OEPA                   Commentor: HSI GeoTrans, Inc.

Section #:5.0           Pg. #: 36                   Line #10-15               Code: C

Comment: The text should indicate that these data will be provided electronically with the quarterly IEMP reports.