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State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

April 30, 1998

RE: DOE FEMP/MSL #531-0297  
COMMENTS-INTEGRATED  
ENVIRONMENTAL MONITORING  
STATUS REPORT FOR FOURTH  
QUARTER 1997

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

Dear Mr. Reising:

Ohio EPA has reviewed the "Integrated Environmental Monitoring Status Report for the Fourth Quarter 1997" submitted by DOE in March 1998. This letter provides, as an attachment, the comments from Ohio EPA.

If you should have any questions, please contact me at (513) 285-6466 or Donna Bohannon at (513) 285-6543.

Sincerely,

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

- cc: Jim Saric U.S. EPA
- Terry Hagen, Fluor Daniel Fernald
- Ruth Vandegrift, ODH
- Francis Barker, Tetratex
- Mark Schupe, HSI Geotrans
- Manager TPSS, DERR

INTEGRATED ENVIRONMENTAL MONITORING  
STATUS REPORT FOR FOURTH QUARTER 1997

General Comments

- 1. Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: 2.0                      Pg. #:                      Line #:                      Code: C  
 Original Comment #:  
 Comment: Will leachate volumes from the OSDF be reported in this section of the IEMP?

Comments

- 2. Commenting Organization: OEPA                      Commentor: DSW  
 Section #: 2.2                      Pg. #: 2-1                      Line #: 30-32                      Code: C  
 Original Comment #:  
 Comment: The NPDES storm drainage in this area is referred to as STRM 4004. I found this confusing as the original designation of this sampling point was STRM002 in the Stormwater Permit Application and accompanying drawing (00X-5500-G-01781). In the current NPDES permit the sampling point is 11O00004004 abbreviated as NPDES 4004. The old STRM004 is actually NPDES 4006. I wouldn't expect the IEMP to change the sampling point designation, but wish to make them aware that there may be some confusion as to the location of their STRM 4004 because of this history.

- 3. Commenting Organization: OEPA                      Commentor: DSW  
 Section#: 2.2                      Pg.#: 2-2                      Line#: 1-2                      Code:  
 Original Comment#:  
 Comment: The statement on page 2-2, lines 1-2 should be qualified as in Table 2-4, i.e., the monthly average total uranium concentration was not exceeded when allowable bypasses are eliminated. I like the reporting in the actual values in Figure 2-4. This aids in interpretation of our sampling results. I also like receiving the raw data. Although I had some initial misgivings about the IEMP and its reporting mechanisms, I'm beginning to be more appreciative of it.

I am concerned about the phosphorus result of well 2636 at the Paddys Run Road Site. We have never sampled the ground water influence of Paddys Run at SR 128 for phosphorus. I realize that this is not directly attributable to Fernald. However, those high levels seem to warrant at least one sample in the stream to see if the phosphorus is making its way to Paddys Run.

- 4. Commenting Organization: OEPA                      Commentor: OFFO  
 Section#: 2.2                      Pg.#: Figure 2-4                      Line#:                      Code:  
 Original Comment#:  
 Comment: The sidebar says that "eight of 10 allowable "significant precipitations"

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bypass days were utilized to maintain the 20 ug/L limit." But referring to the footnotes and totaling the bypasses yields 11 days. Resolve the discrepancy.

5. Commenting Organization: OEPA Commentor: OFFO  
 Section#: 3.2 Pg.#: 3-2 Line#: Code:  
 Original Comment#:  
 Comment: Previous comments (3rd quarter 1997) requested that a summary of the radon data reported in Enclosure C of the FFCA be included in the IEMP quarterly status reports. Again, this data has been omitted. Coordinate with the OEPA and USEPA as to what portions of Enclosure C should be included.

6. Commenting Organization: OEPA Commentor: OFFO  
 Section#: 3.2 Pg.#: 3-1 Line#: 30-33 Code:  
 Original Comment#:  
 Comment: The elevated total uranium and total particulate concentrations in October were also noted in OEPA monitoring results, as well as, AMS8-A. However, it was not to the same magnitude. As agreed in the implementation of the IEMP, how was the specific project notified of this excursion? OEPA should also be notified, to ensure that specific projects are aware of an excursion caused by their activities. This excursion is evidence of poor fugitive dust control practices.

7. Commenting Organization: OEPA Commentor: OFFO  
 Section#: 3.2 Pg.#: 3-2 Line#: 28-41 Code:  
 Original Comment#:  
 Comment: Coordination and communication between the specific projects and the regulators should have been implemented to ensure continuation of monitoring activities in the waste pit area. Although these monitors are not part of the IEMP monitoring strategy they are and will be an integral part of monitoring during the OUI remediation.

8. Commenting Organization: OEPA Commentor: OFFO  
 Section#: 3.2 Pg.#: 3-2 Line#: 28-41 Code:  
 Original Comment#:  
 Comment: This section addresses the removal from service of four air monitors in the area of the Waste Pits. It defers any additional air monitors in this area to Operable Unit 1. The draft Waste Pits Remedial Action Project Remedial Design Package does not contain any specific commitment to perform environmental monitoring. Ohio EPA comments on that package will request development of an environmental monitoring plan to include restarting these four monitors.

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9. Commenting Organization: OEPA                      Commentor: OFFO  
 Section#: 3.2                      Pg.#: 3-2                      Line#:                      Code:  
 Original Comment#:  
 Comment: Previous comments (3rd quarter 1997) requested that a summary of the radon data reported in Enclosure C of the FFCA be included in the IEMP quarterly status reports. Again, this data has been omitted. Coordinate with the OEPA and USEPA as to what portions of Enclosure C should be included.
10. Commenting Organization: OEPA                      Commentor: OFFO  
 Section#: 4.0                      Pg.#:                      Line#:                      Code:  
 Original Comment#:  
 Comment: Impacts resulting from the installation of the south field extraction and injection wells and associated piping were not properly accounted for. The work in this area resulted in significant impacts to grasslands, riparian zones, and stream channels. The impacts to these areas started in 1997 and needed to be accounted for in the IEMP annual report.
11. Commenting Organization: OEPA                      Commentor: OFFO  
 Section#: 4.2                      Pg.#:                      Line#:                      Code:  
 Original Comment:  
 Comment: The "wet areas" located within A1P2 near the former trap range should be evaluated to determine their potential status as wetland. A recent visit by Ohio EPA suggests the area may qualify as a wetland.