



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

October 30, 1998

RE: DOE-FEMP
COMMENTS IEMP
Q2 1998 STATUS REPORT

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

1815

Dear Mr. Reising:

This letter provides Ohio Environmental Protection Agency comments on the Integrated Environmental Monitoring Report for Second Quarter 1998.

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 Hodge, Tetra Tech EM Inc.
- Manager, TPSS/DERR,CO

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**Ohio Environmental Protection Agency Comments on the Integrated Environmental
Monitoring Status Report for Second Quarter 1998**

General Comments

1815

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code: c
Comment: In the upcoming revision to the Integrated Environmental Monitoring Plan, Ohio EPA will request that some meteorological data be included with the data files. This information will be useful in interpreting air and surface water monitoring data.
- 2) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Comment Pg #: na Line #: na Code: C
Comment: When appropriate, specific files on the CD should be referenced in the report. The CD allows for an opportunity to provide detailed data and enhanced graphics, but could be more "user friendly".

Specific comments

- 3) Commenting Organization: Ohio EPA Commentor: HSIGeoTrans, Inc.
Section #: 1.0 Pg #: 1-2 Line #: 27 Code: c
Comment: Well 2551 is not present on Figure1-17; the 2Q98 concentration data for this well should be included in future Summary Reports. Total uranium concentrations in this well were 40 and 27 ug/L in 3Q97 and 4Q97 respectively.
- 4) Commenting Organization: Ohio EPA Commentor: HSIGeoTrans, Inc.
Section #: 1.0 Pg #: 1-3 Line #: 40 Code: c
Comment: The eastward groundwater flow vector indicated by the June 1 boroscope measurement in Well 2551 does support the contention that groundwater flow in the general vicinity of this well is to the east-southeast toward the South Plume recovery wells. The existence of elevated total uranium concentrations in this well during recent sampling events, however, require additional investigation. For example, do the observed concentrations in 2551 represent a western extension of the existing plume to the north or do they result from transient westward flow during storm events? Although the results reported at 2551 are encouraging, it is clear that the plume is not particularly well understood in this area. Comparison of 2551's location with the interpreted capture zone (Biweekly Update Attachment 4 dated 10/2/98) with all the restoration modules operating shows that the well is located near the edge of the zone. Plume uncertainties in this area, therefore, may result in contaminant migration beyond the current capture zone.
- 5) Commenting Organization: Ohio EPA Commentor: HSIGeoTrans, Inc.
Section #: 1.0 Pg #: 1-5 Line #: 6 Code: c
Comment: The text notes that " chromium and nickel FRL exceedances at Monitoring Well 2398

have been previously observed and were discussed in Appendix A, page A.4-4, of the 1997 Integrated Site Environmental Report." That report states that "during 1998, DOE will further investigate the role of chloride as a corrosive agent that may be contributing to increases in nickel and chromium in monitoring wells at the FEMP." The 3Q98 Summary Report should report on the status of these investigations because the chromium FRL exceedances in 1997 show some evidence of spatial correlation.

- 6) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.2 Pg #: 1-5 Line #: 33 Code: c
Comment: Ohio EPA concurs with the Report's conclusion that the total uranium concentrations in the leachate collection system, leak detection system, and the horizontal till well are not consistent with a release from Cell 1. We will all be re-evaluating this conclusion as more data is collected.
Next week Ohio EPA will send comments on the "Technical Memorandum for the On-Site Disposal Facility Cell 1 Baseline Groundwater Conditions". At that time we will request some additional data to be contained in future Summary Reports.
- 7) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.2 Pg #: 1-6 Line #: 10 Code: c
Comment: How/where were the leachate volumes measured? Do the volumes include non-contact rain water which should not have been pumped to the AWWT?
- 8) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.2 Pg #: 3-1 Line #: 36 -38 Code: C
Comment: The increasing trends in biweekly uranium data observed at AMS-3 and AMS-9C, are attributed to the increased activity at the OSDF and other remediation projects. As noted, construction managers must be aware that controlling fugitive dust is paramount to keeping dose to the public ALARA. OEPA observed visible fugitive emissions at the OSDF during the second quarter 1998.
- 9) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.2 Pg #: 3-2 Line #: 19-46 Code: C
Comment: The composite concentration attributed to AMS-25 is not consistent with the associated weekly data. Also, review of the isotopic data is reveals inconsistencies. DOE should implement administrative controls to prevent the stockpiling of materials near the air samplers. This step would eliminate one of the interferences that may occur at any of the compliance air samplers.
- 10) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: Figure 3-4 thru 3-13 Pg #: na Line #: na Code: C
Comment: Combine TSP graphs with total uranium graphs. This would allow for easier interpretation of the data, as well as, decrease the number of figures presented.

- 11) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Figure 3-3 Pg #: na Line #: na Code: C
Comment: Add additional meteorological data to include: precipitation, barometric pressure, and stability class. Summary data should be included in this figure, and hourly data could be added to the CD containing detailed data.
- 12) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.0 Pg #: 4.1 Line #: Code: c
Comment: The wetlands delineation for the trap range in Area 1, Phase 2 should have been completed during the time period covered by this Status Report. This delineation should be completed prior to planning or conducting any construction in the trap range and should be reported in the next Status Report. The area of the wetlands that will be destroyed during the trap range remediation will of course need to be added to the areas that were previously agreed to require replacement.