



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

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January 22, 1999

RE: DOE FEMP/MSL #531-0297
COMMENTS-INTEGRATED
ENVIRONMENTAL MONITORING
STATUS REPORT FOR THIRD
QUARTER 1998

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 Third Quarter 1998" submitted by DOE on December 1998. This letter provides, as an attachment, the comments from Ohio EPA.

If you should have any questions, please contact me at (937) 285-6466 or Donna Bohannon at (937) 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
- Francis Barker, Tetrattech
- Ruth Vandegrift, ODH
- Mark Schupe, HSI Geotrans
- Manager TPSS, DERR

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- 9) Commenting Organization: Ohio EPA Commentor: DSW
Section #: SW Data Pg. #: NA Line #: 225-240 Code: C
Comment: There is not total uranium data for SWD-01. Total uranium was going to be added to the parameter list for this sampling location.
- 10) Commenting Organization: Ohio EPA Commentor: DSW
Section #: SW Data Pg. #: NA Line #: NA Code: C
Comment: The reporting of the surface water data is still confusing. Sampling frequency, reporting time frames and parameters reported are not clear. For example the following was noted with respect to the sampling location at the Storm Water Retention Basin:
1) There are different sample dates. The NPDES and FFCA samples were taken in July and the IEMP samples were taken in April. Why is there such a time lag with the IEMP data reporting? The lag time is noticed when comparing the IEMP data to the NPDES and FFCA data. In the second quarter data package, the April NPDES and FFCA data was reported. Why wasn't the IEMP results from April sampling also reported in that package rather than this package?
2) The data shows multiple samples on the same date for the same parameter with different results, but the additional samples are not listed as duplicates under the "QA type" column (e.g., three cadmium samples taken on 4/16/98). Why are there multiple samples taken? Please clarify.
3) the parameters reported do not match the parameters listed in Table 4-12 of the IEMP or the NPDES permit. For example, total suspended solids, oil and grease, and flow rates do not show up in the NPDES data.
4) The permit and Table 4-12 state that daily samples must be taken and it appears from the second quarter FFCA data that overflow occurred on 4/16, 4/17, 4/18, and 4/19 but sampling was only reported for 4/16 in the third quarter NPDES data.
5) Table 4-3 in the IEMP shows aluminum to be sampled along with other parameters at each overflow event but aluminum does not show up in the surface water data for 4/16.
- 11) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.2 Pg. #: 3-2 thru 3-3 Line #: na Code: C
Original Comment #:
Comment: The project specific monitors for Thorium/Plant 9 Complex and the Sewage Treatment Plant Complex should be included in figures (Figure 3-2) denoting location and the collected data (Table 3-1).

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- 12) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Table 3-1 Pg. #: 3-7 Line #: na Code: C
Original Comment #:

Comment: The concentrations recorded at AMS-3 are significantly higher than any of the other samplers most probably due to activities in the Sewage Treatment Plant Complex. Additional data from existing project-specific samplers should be included and evaluated to demonstrate DOE commitment to keeping contamination ALARA.