



**Department of Energy**

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**1966**

**JAN 28 1999**

Mr. James A. Saric, Remedial Project Manager  
U.S. Environmental Protection Agency  
Region V-SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0377-99

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5<sup>th</sup> Street  
Dayton, Ohio 45402-2911

Mr. Val Orr  
Division of Drinking and Ground Waters - UIC Unit  
P.O. Box 1049  
1800 Watermark Drive  
Columbus, Ohio 43216-1049

Dear Mr. Saric, Mr. Schneider, and Mr. Orr:

**RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON  
THE SEPTEMBER 1998 MONTHLY OPERATING REPORT FOR THE RE-INJECTION  
DEMONSTRATION**

This correspondence submits responses to the Ohio Environmental Protection Agency (OEPA) comments on the September 1998 Monthly Operating Report for the Re-Injection Demonstration.

If you have any questions regarding this submittal, please contact John Kappa at (513) 648-3149.

Sincerely,

Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Kappa

Enclosure

JAN 28 1999

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Mr. James A. Saric  
Mr. Tom Schneider  
Mr. Val Orr

cc w/enclosure:

G. Jablonowski, USEPA-V, SRF-5J  
R. Beaumier, TPSS/DERR, OEPA-Columbus  
M. R. Rochotte, OEPA-Columbus  
T. Schneider, OEPA-Dayton (total of 3 copies of enc.)  
F. Bell, ATSDR  
M. Schupe, HSI GeoTrans  
R. Vandegrift, ODH  
F. Barker, Tetra Tech  
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K. Broberg, FDF/52-5  
D. Carr, FDF/52-5  
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cc w/o enclosure:

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J. Harmon, FDF/90  
R. Heck, FDF/2  
S. Hinnefeld, FDF/90  
EDC, FDF/52-7

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**RESPONSES TO OEPA COMMENTS ON THE  
SEPTEMBER 1998 MONTHLY OPERATING REPORT  
FOR THE RE-INJECTION DEMONSTRATION**

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT  
FERNALD, OHIO**

**JANUARY 1999**

**U.S. DEPARTMENT OF ENERGY  
FERNALD AREA OFFICE**

Attachment to: H-00529 DOE-0377-99

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RESPONSES TO OEPA COMMENTS ON THE  
SEPTEMBER 1998 MONTHLY OPERATING REPORT  
FOR THE RE-INJECTION DEMONSTRATION

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Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.  
Section#: N/A Pg. #: 2 Line#: 11 Code: C  
Original Comment# 1

Comment: The referenced test indicates that there were no FRL exceedances for the July and August samples. Table 2, however, shows that the estimated value for antimony is greater than the FRL.  
Response: The estimated concentration of antimony, measured in the injectate sample collected on August 19, 1998, is well below the groundwater FRL of 0.006 mg/L. It was incorrectly reported as being 0.432 mg/L. The concentration was actually 0.432  $\mu$ g/L, or 0.000432 mg/L.  
Action: The table in question will be corrected and reissued in the December Operating Report on the Re-Injection Demonstration.

Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.  
Section#: N/A Pg. #: 4 & 5; Tables 1 & 2 Line#: N/A Code: C  
Original Comment# 2

Comment: The groundwater FRLs shown in Tables 4 and 5 for lead and vanadium do not agree with OU5 ROD Table 9-4. The tables have 0.015 and 0.038 mg/L for these constituents respectively while the ROD indicates a value of 0.002 mg/L for both. Would it be possible to highlight FRL exceedances in future tables by presenting them in bold typeface?  
Response: The groundwater FRL concentration for lead has been changed from 0.002 mg/L (reported in the OU5 ROD) to a concentration of 0.015 mg/L. A fact sheet detailing the FRL change was issued in the Restoration Area Verification Sampling Program Project Specific Plan, dated May 1997. A revised Table 9-4 was also issued to all known recipients of the OU5 ROD. Our records indicate the fact sheet and revised table were sent to Mr. Dave Ward. The groundwater FRL concentration for vanadium is reported in Table 9-4 of the OU5 ROD as being 0.038 mg/L. DOE agrees that the report could be improved if future FRL exceedances were presented in bold typeface.  
Action: Future monthly operating reports will present FRL exceedances for the injectate sample in bold typeface.

Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.  
Section#: N/A Pg. #: 6-10; Tables 3-7 Line#: 13 Code: C  
Original Comment# 3

Comment: For the "hours not injecting" section in the individual well operational summary tables, a brief explanation is provided to indicate the cause of the outage. For the October reporting period, this reporting scheme is apparently adequate because pumpage from all wells seem to have been halted because of a lightning strike. This approach may not be satisfactory when a well is not operational at different times for different reasons. To more clearly present outage information in future reports, a separate table should be included that lists the well, the starting and ending times of the outage, and the reason for the outage.  
Response: As written now, each individual Well Operational Summary Table lists reasons why re-injection did not take place 100 percent of the available reporting period. Specific stop and start times, for each individual well outage, are not reported. It is felt that the current level of detail being provided in the monthly reports is sufficient for meeting the intent of the report and as explained below DOE does not want to get involved in reporting more detailed information at this time.

Re-Injection is in a demonstration stage at the FEMP. The objective of the subject monthly operating reports is to satisfy reporting requirements of the Ohio EPA Underground Injection Control (UIC) Unit while the demonstration is in progress. The report is structured to give the Ohio UIC Unit information needed to determine whether or not re-injection activities are being protective of the aquifer, not to track re-injection efficiency to the level of detail being requested.  
Action: No change to the monthly operating reports is required.

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