



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

February 8, 1999

RE: DOE FEMP
MSL #531-0297
RESPONSES to U.S. EPA & OEPA
COMMENTS ON THE DRAFT
INTEGRATED ENVIRONMENTAL
MONITORING PLAN
(REVISION 1) January 1999

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

Dear Mr. Reising:

Ohio EPA has reviewed the Responses to U.S. EPA & OEPA Comments on the Draft Integrated Environmental Monitoring Plan (Revision 1) dated January 1999. This letter provides as an attachment the comments of 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, FERMCO
Ruth Vandegrift, ODH
Francis Barker, Tetra Tech, Inc.
Mark Shupe, Geo Trans
Manager TPSS, DERR/CO
Joe Bartoszek, OEPA
Mike Proffitt, OEPA

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**RESPONSE TO U.S. EPA & OEPA COMMENTS
ON THE DRAFT
INTEGRATED ENVIRONMENTAL MONITORING PLAN (REVISION 1)**

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.2 Pg #: 1.2-1.3 Line #:16-38, 1-4 Code: C
Original Comment #: 4
Comment: The responses to this comment state that "DOE agrees that addressing stakeholder concerns...is a primary objective of the IEMP" then continues to explain that the objective is "embodied within the overall design" and is "intrinsic to the...surveillance monitoring function as defined..." and as such believes that no revision to the IEMP is necessary. We agree that addressing stakeholder concerns should be one of the important program objectives (as stated in the original comment) and consequently do not understand why DOE does not mention this objective specifically under section 1.2, Program Objectives and Scope. If it is a "primary objective of the IEMP" then stating it under the Program Objectives and Scope certainly seems appropriate even if it is "embodied within the overall design" and is "intrinsic to the...surveillance monitoring function."

- 2) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.6.5 Pg #: 3-74 Line #: Code:
Original Comment #: 18
Comment: The Ohio EPA is concerned with the DOE's response to this question. This response gives the impression that it may take many months before data is entered into the site database. Ground water data is very time sensitive, and needs to be evaluated in a timely manner. How often does it take three or more months to get the data entered? What is done with the data while it is waiting for validation or data entry? Ohio EPA wants to minimize the chances that time critical decisions are delayed while data is held up for validation or data entry, especially if the data is deemed usable in its "draft" form.

- 3) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.2 Pg #: 4.2-4.6 Line #: Code: C
Original Comment #: 26
Comment: The comment refers to the emphasis placed on monitoring only as required by regulatory drivers, and that the list of regulatory drivers is not complete. The focus on monitoring, only as required by regulatory drivers as listed, means that the list should be as complete as possible. OAC 3745-1-04 was given only as an example, and OEPA does not agree with the DOE response that "compliance with this code and monitoring

requirements are met through the NPDES.” For example, the NPDES permit states, in Part III, Section 2 (General Effluent Limitations), that “The effluent shall, at all times, be free of substances: A. In amounts that will settle to form putrescent, or otherwise objectionable, sludge deposits; or that will adversely affect aquatic life or water fowl; B. Of an oily, greasy, or surface-active nature, and of other floating debris, in amounts that will form noticeable accumulations of scum, foam or sheen; C....”, etc. During the spill of diesel fuel in Paddys Run this past Spring, an oily discharge in violation of the rule occurred but compliance or monitoring under the NPDES did not take place. This discharge did not occur through the an NPDES discharge, it was downstream of any monitoring points under the NPDES permit. This is one example of a recent actual event. The concern is that there are many unforeseen circumstances that can occur that would not be caught under the short list of regulatory drivers in 4.2.2 and Table 4-1. It would therefore appear that the list needs to be more complete or the umbrella of drivers for monitoring needs to be expanded beyond only regulatory drivers.

- 4) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.4.2.3 Pg #: 4-18 Line #: 6 Code: C
Original Comment #: 31
Comment: If a periodic review of the flows from the Hamilton Dam gauge will be conducted to determine the conservativeness of the 7Q10 value, then why not state this in the IEMP?