



State of Ohio Environmental Protection Agency

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May 27, 1999

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

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Re: ADDITIONAL COMMENTS, OSDF TECHNICAL MEMO CELL 1 BASELINE
CONDITIONS

Dear Mr. Reising:

This letter provides Ohio Environmental Protection Agency comments on the "Responses to USEPA and Ohio EPA Comments on the Draft Technical Memorandum for OSDF Cell 1 Baseline Groundwater Conditions" transmitted in your letter DOE-0603-99. The responses are for the most part satisfactory except for one significant issue and one minor comment.

The response to Ohio EPA comment #2 (last paragraph on page 3) includes the statement "Since the projected schedule of the horizontal till well installation and initial impacted material placement will continue to have a relatively short time between them, the strategy is the same for Cells 1 through 8 as that for Cells 1, 2, and 3; which is purge and sample the wells before and during impacted material placement for a minimum of two years to allow for the collection of independent samples and for the data to be representative of seasonal variations." Our concern is that background groundwater data is being collected for a given cell *after* waste has been placed in the cell. In the case of Cells 1, 2, and 3 we agreed to this inconsistency with the Ohio Solid Waste Rules and accepted statistical practice because of our reluctance to delay the start of OSDF operations. It was not our intention to shorten the duration of background data collection for all of the OSDF cells. The construction schedules that we have show that Cell 4 construction will start in the year 2001. Presumably waste placement would begin roughly in December 2001. To collect the 2 years background data, construction of the Cell 4 horizontal wells should be scheduled for this construction year.

Original comment #3 questions the source of recharge to the horizontal wells. The response to the comment is stated to be included in the FEMP response to OEPA Original

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Comment 2. However, this response indicates only that the "hydrogeological conditions" in the vicinity of the OSDF have been changed due to construction. In order to better understand the performance of future horizontal wells installed at the facility, the trenching phase of horizontal well construction should include lithologic logging of the materials encountered in the trench. Isolated zones of coarse grained material may act as a water source to the horizontal wells. An understanding of the lithology in contact with the horizontal wells will aid in understanding their water producing characteristics.

If you have any questions, please contact Tom Ontko or me.

Sincerely,



for

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

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Francie Hodge, Tetra Tech EM Inc.
Ruth Vandergrift, ODH