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2437

George V. Voinovich
Governor

August ~~28~~ 9, 1999

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

RE: IEMP COMMENTS

Dear Mr. Reising:

Ohio EPA has reviewed DOE's Annual *1998 Integrated Site Environmental Report (May 1999)*and included comments.

If there are any questions, please contact me at (937) 285-6466 or Donna Bohannon at (937) 285-6543.

Sincerely,

Donna Bohannon for

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

cc: Jim Saric U.S. EPA
Terry Hagen, Fluor Daniel Fernald
Francis Barker, Tetratech
Ruth Vandegrift, ODH
Mark Schupe, HSI Geotrans

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1998 INTEGRATED SITE ENVIRONMENTAL REPORT
May 1999

Comments

1. Commenting Organization: Ohio EPA Commentor: DSW
Section #: General Pg #: na Line #: na Code: E
Original Comment #:
Comment: It is obvious an effort was made to clear up the difficulty in reading the sidebars. The transition from color to black and white, still leaves these sidebars difficult to read. Whereas with the color copies I can still read the sidebars, but with the black and white versions, I skip them because they are too difficult to read.

2. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Pg. #: NA Line #: NA Code: E
Original Comment #:
Comment: The text states that one of the drivers of the ISER is to track and trend air monitoring data. The graphical representation of the data is buried within the appendices. A method for displaying the graphically within the body of the text should be considered.

3. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: NA Pg.#: NA Line #: NA Code: G
Original Comment #:
Comment: The Mann-Kendall test for trend is frequently used in Appendices A.1 through A.6. US EPA guidance (US EPA, 1998) recommends use of the normal approximation form of the test for large sample sizes (more than 10). The exact test should be used for smaller sample sizes. The footnotes at the bottom of the Mann-Kendall test results tables should note that the normal approximation form of the test was used where appropriate.

4. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 1.3.2 Pg #: 9 Line #: Figure 1-3 Code: E
Original Comment #:
Comment: The addition of the blue line to highlight Paddys Run is a welcome addition, however in the vicinity of the southern waste units, the blue line does not follow Paddys Run. In particular, the area that was stabilized with the bioengineering is north of the blue line indicating Paddys Run. As this section of Paddys Run is especially significant since it has the bioengineered stream banks, it seems relevant to accurately highlight Paddys Run in this area.

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5. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 2.1.5 Pg #: 29-30 Line #: Code: E
Original Comment #:
Comment: The last two bullets on page 29 are repeated on page 30.

6. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.3.3 Pg #: Table 3-3 Line #: Code: c
Comment: The total uranium concentration reported for monitoring location 12339D along with the volumes presented in Figure A.6-3 are indicative of a catastrophic failure of the OSDF Cell 2 liner system. Regardless of the explanations provided in Section A.6.2, deferring the reporting of failures of this magnitude for six months (from December of 1998 until the delivered date of this Report , June 1, 1999) is unacceptable.
Discussions are currently underway with representatives of the Aquifer Restoration and Wastewater project to determine which of the currently measured data are sufficient to meet the needs of the Ohio EPA. We anticipate that the reporting will be accomplished by the weekly fax.

7. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 4.1 Pg #: 65 Line #: bottom of page Code: E
Original Comment #:
Comment: It appears as though the last sentence on this page was cut off. There is only one pathway given.

8. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.3.1 Pg #: 91 Line #: NA Code: C
Original Comment #:
Comment: The results obtained from STP-1 should be included in the dose assessment for the site. Air monitoring was implemented at this location to fill a hole in the IEMP monitoring network associated with the STP area remediation. Dose assessments are intended to be conservative and hence, should include STP-1 as a fence line monitor. (Note: STP-1 was not placed in the prevalent wind direction.)

9. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 6.5 Pg #: 112 Line #: NA Code: C
Original Comment #:
Comment: In order to verify/justify the use of the 0.7 equilibrium ratios for the radon dose assessment, FEMP should consider measuring this ratio at select fence line radon monitoring locations.

10. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: Appendix A.1 Pg.#: A.1-4 Line #: 32 Code: C
Original Comment #:
Comment: The text indicates that with the continued monitoring of Monitoring Wells 2128 and 2900, the loss of access to Monitoring Well 2458 should not adversely affect the monitoring network. It should also be noted that Monitoring Well 2636 is in closer proximity to 2458 and also was "down significant." The continued monitoring of this well will also be important given the loss of 2458.

11. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: Appendix A.2 Pg.#: Figure A.2-3 Line #: NA Code: E
Original Comment #:
Comment: The location of the Inactive Flyash Pile should be shown on the Figure for reference.

12. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: Appendix A.2 Pg.#: Figure A.2-5 Line #: NA Code: E
Original Comment #:
Comment: The contours in the south field vicinity are confusing. Both third and fourth quarter contoured plumes appear to be presented. There is, however, no explanation on the figure or in the text.

13. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: Appendix A.2 Pg.#: A.2-1 Line #: 33 Code: C
Original Comment #:
Comment: The statement that total uranium concentrations have not changed significantly in the area south of the inactive flyash pile is contradicted by one of the two sets of contours shown on Figure A.2-5. Further, at least at one monitoring point (Extraction Well 31566), concentrations spiked upward significantly during the fourth quarter (from just less than 10 to nearly 50 ug/L).

14. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: Appendix A.2 Pg.#: Figures A.2-6 and 7 Line #: NA Code: E
Original Comment #:
Comment: These figures should state the quarter when the geoprobe data used to construct the cross sections presented on them was collected.

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15. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: Appendix A.2 Pg.#: A.2-4 Line #: 3 Code: C
Original Comment #:
Comment: Please indicate the portion of the period of record for Monitoring Well 2648 that was affected by surface water inflow.

16. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: Appendix A.2 Pg.#: A.2-4 Line #: 22 Code: E
Original Comment #:
Comment: Figure references A.1-12 and A.1-15 should be A.1-6 and A.1-9, respectively.

17. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: Appendix A.3 Pg.#: A.3-2 Line #: 31 Code: C
Original Comment #:
Comment: The text should also note that an additional well showing significant change from third to fourth quarter was 22303. It showed southwestward flow with very low variability in second and third quarters but was transitional from southeast to northeast to south-southwest during the fourth quarter period of observation (see Figure A.3-85). It should also be noted that there is very low variability around the observed trend. Is there any connection among the fourth quarter observations at 22303 and changes in south plume optimization well 32308 and 32309 pumping rates at about the same time?

18. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: Appendix A.3 Pg.#: A.3-2 Line #: 31 Code: C
Original Comment #:
Comment: The text makes the general assertion that the observed flow direction changes may reflect "recharge conditions" within the aquifer. This term needs clarification. Are the recharge conditions believed to be the result of precipitation and are, therefore, transient? What is the likelihood that the observed flow direction changes are a permanent byproduct of reinjection?

19. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: Appendix A.5 Pg.#: A.5-1 Line #: 9 Code: E
Original Comment #:
Comment: The text is misleading in that it implies that all results (i.e., every analyses ever run in the past) were below the FRL when some results since 1993 were above.

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20. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: Appendix A.6 Pg.#: A.6-2 Line #: 24 Code: E
Original Comment #:
Comment: The FEMP perched water constituent concentrations defined in the OU 5 RI that are referenced should be provided.

Reference:
U.S. EPA 1998. Guidance for Data Quality Assessment, Practical Methods for Data Analysis. EPA QA/G-9, QA97 update.

21. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Appendix E Pg #: E-2 Line #: na Code: C
Original Comment #:
Comment: To assist the reader with a frame of reference for these results, it may be useful to include a column with the FRLs.