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**RESPONSES TO U.S. EPA AND OEPA COMMENTS  
ON THE INTEGRATED ENVIRONMENTAL  
MONITORING STATUS REPORT FOR  
FIRST QUARTER 1999**

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT  
FERNALD, OHIO**

**SEPTEMBER 1999**

**U.S. DEPARTMENT OF ENERGY**

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responses to the U.S. Environmental Protection Agency (EPA) and the Ohio Environmental Protection Agency (OEPA) comments on that document.

**Action:** The following text will be added to the On-Site Disposal Facility Sampling portion of Section 1 of the Integrated Environmental Monitoring Status Report for Second Quarter 1999:

"It can be concluded that the impact of any leakage from the pipeline that may have reached the environment through the two identified containment pipe leaks was negligible. This conclusion is based on radiological surveys of, and soil samples from the excavated areas. Radiological surveys were conducted during the excavation. These surveys showed no radioactivity above background levels. Soil samples were also collected to determine if leachate had been released into the environment. The soil was sampled at the excavations where leaks would have been most likely to occur based on pipe installation records and observations made during field investigations. Analytical results of the soil samples showed no indication of contamination in the environment. Additional information on the pipeline leaks can be found in the Soil and Disposal Facility Project-specific documentation.

3. **Commenting Organization:** U.S. EPA **Commentor:** Saric  
**Section#:** 2.2 **Pg.#:** 2-3 **Line#:** 34 **Code:**  
**Original Specific Comment#** 3

**Comment:** The text states that there were two maintenance bypass days in March 1999, but Table 2-1 states that there were three bypass days during that month. This discrepancy should be reconciled.

**Response:** DOE acknowledges the comment. Table 2-1 correctly identifies the number of bypass days during that month. The text should have also stated three maintenance bypass days.

**Action:** In the future, DOE will ensure that the table and text are consistent.

4. **Commenting Organization:** U.S. EPA **Commentor:** Saric  
**Section#:** 3.2 **Pg.#:** 3-2 **Line#:** 13 through 15 **Code:**  
**Original Specific Comment#** 4

**Comment:** The text states that during the first quarter of 1999, air monitors at locations AMS-7 and AMS-27 were temporarily out of service and operated less than 95 percent of the time. If similar situations occur in the future, the U.S. Department of Energy (DOE) should provide the specific percentage of air monitoring operating time in the quarterly report.

**Response:** DOE agrees with the comment. If similar situations occur in the future (air monitoring station operating less than 95 percent of the time during the quarter of interest), then the Integrated Environmental Monitoring Plan (IEMP) quarterly status reports will provide specific percentages of air monitoring operating times. It should be noted that the above referenced locations, AMS-7 and AMS-27, operated for approximately 99 percent of the available run time during the second quarter of 1999, which increased the year-to-date operating time to 93 percent and 97 percent, respectively. Assuming typical operations during the remainder of 1999, the percentage of operation at AMS-7 is expected to exceed the annual requirement for operating 95 percent of the time.

**Action:** DOE will include air monitoring operating information in IEMP quarterly status reports if an air monitoring station operates less than 95 percent of the time during the quarter of interest as indicated.



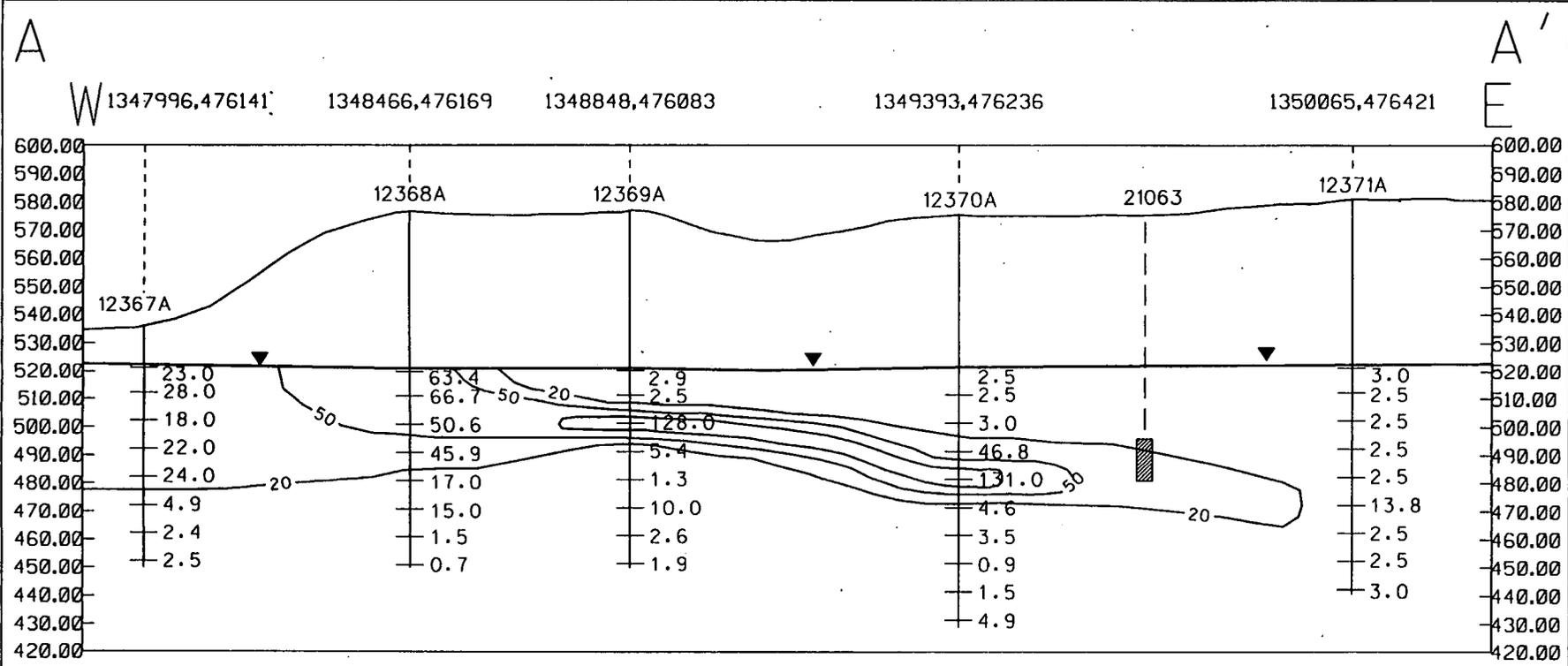








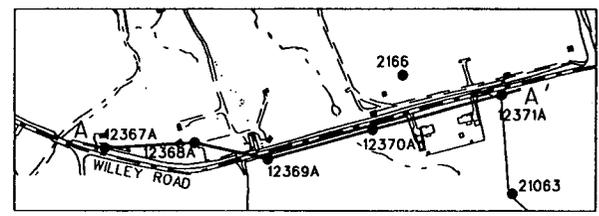




**LEGEND:**

+ 1.5 TOTAL URANIUM  $\mu\text{g/L}$   
IN GROUNDWATER

**NOTE:**  
FIRST SAMPLE EVENT  
(ROUND A)



FINAL

FIGURE 1. CROSS SECTION A-A' GEOPROBE RESULTS FOR TOTAL URANIUM IN GROUNDWATER, MAY 12, 1998 TO JULY 7, 1998

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