



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:

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Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

SRF-5J

RE: 1999 Annual Integrated
Environmental Monitoring
Report

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) proposed changes to the 1999 annual Integrated Environmental Monitoring Plan (IEMP).

This document provides necessary program modifications to the IEMP to be consistent with near-term remediation activities.

U.S. EPA has enclosed its comments on the changes. Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

TECHNICAL REVIEW COMMENTS ON
PROPOSED CHANGES RESULTING FROM THE 1999 ANNUAL REVIEW
OF THE INTEGRATED ENVIRONMENTAL MONITORING PLAN

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Summary Table Page #: 3 Line #: Not applicable (NA)
Original Specific Comment #: 1

Comment: The text states that groundwater monitoring at several wells will be discontinued. However, sampling results presented in the 1998 integrated site environmental report indicate that the total uranium levels in monitoring wells 2434 and 3880 are low but erratic and that the wells should remain monitored. The total uranium levels in well 2880 are also low but have been steadily increasing over time, and the well should remain monitored.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Attachment 1 Page #: NA Line #: NA
Original Specific Comment #: 2

Comment: The text provides calculations for a revised estimate of uranium loading from uncontrolled surface runoff. An attempted replication of the calculations revealed some minor differences in the numbers. First, the unit conversion factor in Equation 1 is 0.008337. This factor was 0.0083454046 when recalculated from values of 3.785412 liters per gallon and 2.2046226 pounds per kilogram. Next, in applying Equation 2, the calculated results for "V" were greater than those listed in Table A-3, such as 7.40253 for STRM 4003 rather than the tabulated value of 7.361. Based on these differences, the estimated final loading value is 2.55 pounds per inch rather than 2.53 pounds per inch. The loading value should be recalculated after the conversion factors are checked. During recalculation, roundoff and truncation errors should be avoided by retaining an excessive number of significant figures until the final summation.

In addition, similar documentation should be provided for estimates used to establish the loading value of 6.25 pounds of total uranium discharged to Paddys Run. This documentation is necessary to allow evaluation of the current estimate.