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George V. Voinovich
Governor

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January 24, 2000

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

RE: ADDITIONAL COMMENTS ON THE INTEGRATED ENVIRONMENTAL MONITORING STATUS REPORT FOR THIRD QUARTER 1999

Dear Mr. Reising:

Attached are additional Ohio EPA comments on the Integrated Environmental Monitoring Status Report for the Third Quarter 1999.

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 Hodge, Tetratech
Ruth Vandegrift, ODH
Mark Schupe, HSI Geotrans
Manager TPSS, DERR

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ADDITIONAL OHIO EPA COMMENTS ON THE INTEGRATED ENVIRONMENTAL MONITORING STATUS REPORT FOR THIRD QUARTER 1999

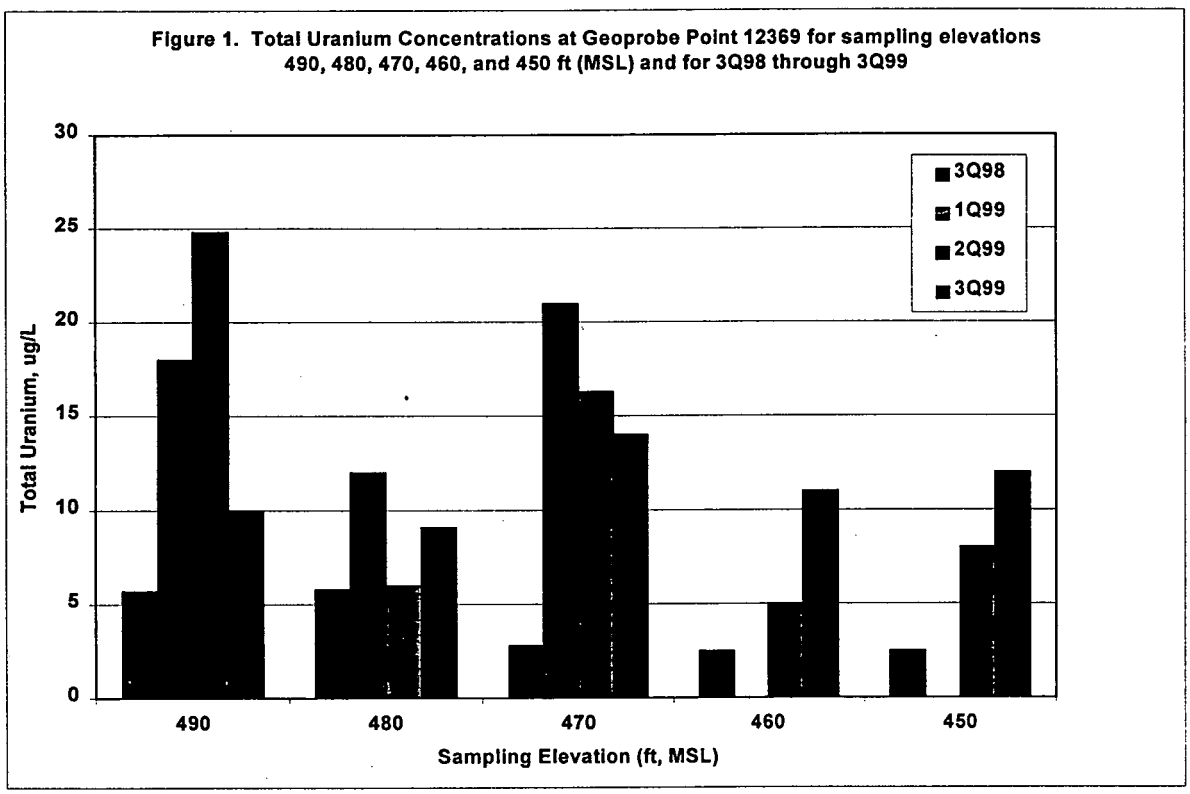
1. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: NA Pg.#: NA Line #: NA Code: G
Original Comment #:
Comment: The entire document including all figures and tables should be made available in a single portable document file (PDF) that can be downloaded. It is important that reviewers have the ability to download the complete document for achieving purposes. The archived quarterly monitoring reports are frequently referenced during document review.

2. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: NA Pg.#: NA Line #: NA Code: E
Original Comment #:
Comment: Figures and tables often overlap one another in the internet document. For example, Table 1-1 overlaps with Figure 1-6 and Figures 1-7 and 1-6 overlap. The overlap can compromise the ability to clearly interpret the respective figure or table.

3. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: NA Pg.#: NA Line #: NA Code: E
Original Comment #:
Comment: The row headings on many of the tables in the internet document do not align accurately with the information in presented in the table. Tables 1-1, 1-2, and 2-2 are examples.

4. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: 1.0 Pg.#: 1-4 Line #: 5 Code: C
Original Comment #:
Comment: Concentrations for sampling elevations 460 and 450 ft (MSL) at Geoprobe Point 12369 appear to be increasing since the beginning of re-injection operations (Figure 1). Although only three data points are available, the increase is present at both sampling levels and may indicate southward migration of the total uranium plume beneath the re-injection zone. The observed increases suggest that one year of Geoprobe sampling may not be sufficient for fully understanding the effects of re-injection on plume migration patterns. Should the Geoprobe sampling

be continued (perhaps on a less frequent schedule) in order to assess if the observed trend is significant?



5. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section #: 2.0 Pg.#: 2-9 Line #: 2 Code: C
Original Comment #:
Comment: The text indicates that the Great Miami Aquifer monitoring well for Cell 4 could not be developed because of a low water level, resulting from the drought conditions that existed when the well was installed. Could the well have been completed at a slightly deeper depth? Also, will it be possible to sample the well should a similar drought be encountered in the future?