OhioEPA
State of Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

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George V. Voinovich
Governor

January 20, 2000

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

RE: COMMENTS ON THE RESPONSES TO OEPA COMMENTS ON THE INTEGRATED ENVIRONMENTAL MONITORING STATUS REPORT FOR SECOND QUARTER 1999

Dear Mr. Raising:

Ohio EPA has reviewed the Responses to OEPA Comments on the Integrated Environmental Monitoring Status Report for Second Quarter 1999, submitted by DOE. This letter provides, as an attachment, the comments from the Ohio EPA.

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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RESPONSES TO OEPA COMMENTS ON THE INTEGRATED ENVIRONMENTAL MONITORING STATUS REPORT FOR SECOND QUARTER 1999

1. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section: 1.0 Pg.: 1-4 Line#: 39 Code: C
Original Comment: # 4
Comment: As indicated in the original comment, the need to obtain groundwater level measurements in the Type 3 wells is driven by the presence of above-FRL total uranium concentrations at some locations at the site. The water level data is needed to show that upward gradients are established during remediation of the areas of deeper contamination. Although the gradients are unquestionably slight, they do exist and do appear to be downward for at least some of the record at the wells discussed in the referenced documents. It seems unlikely that they can explain as "attributable to measurement, transcription, or keypunch error." It seems reasonable that the number of Type 3 Monitoring Wells for water level measurement can be reduced. Wells should be proposed on a case specific basis rather than the complete elimination of all Type 3 water level monitoring.

2. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
Section: 1.0 Pg.: Figs. 1-30 & 1-31 Line#: N/A Code: C
Original Comment# 5
Comment: The comment response indicates that the base of the plume was located at Geoprobe Point 12369 in Round A, and was verified in Round B. The decision was then made to limit the sampling depth based on this information when conducting Round C. Sampling for Round D was conducted the final depth of Rounds A and B. An obvious concern during re-injection as stated in the plan is migration below the injection zone. Deeper portions of the aquifer that sampled clean in previous rounds may, therefore, show increases in concentration during later rounds. Sampling should be conducted to the maximum depth possible in order to meet the objectives of the plan.

3. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 4.0 Pg. #: 4.3 Line #: 5-11 Code: C
Original Comment #: 21
Comment: It is agreed that an intense storm could cause turbidity, however the turbidity from the site should not exceed ambient turbidity in Paddys Run. This was the reason for having field inspections after rain events.

- DOES' response was, that three days later turbid conditions were no longer present and no further action was required is unacceptable. There wasn't any rain in the intervening time and it is intuitively obvious that turbid conditions will abate. The SWPPP calls for inspections of sediment controls after a precipitation event of at least

0.5 inches and the purpose of sections Appendix D.2.1 and D.3 are to protect the habitat of Sloan's Crayfish from excessive sediment loads from site activity. To say it stopped raining so the turbidity dropped is unacceptable. If the turbidity from the site exceeds that of Paddys Run, it is expected that an investigation of the cause and report of the findings and corrective actions will follow.

- Your meteorological data submitted to us does not support the statement that "more than one inch of rain fell within a one hour period" in your response. The largest hourly rainfall on April 9 is 0.69-inch at 4 A.M..
- The statement that the increased turbidity could have been caused by runoff through exposed cut banks is speculative. Paddys Run also has exposed cut banks. The increased turbidity from the site could also have been caused by failed sediment controls, newly disturbed soils, or a myriad of other conditions. As stated above, the cause needs to be investigated, reported, and corrected. The turbidity from the site should not exceed ambient turbidity in Paddys Run.

4. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg. #: Line #: Code: C
Original Comment #: 15
Comment: Disagree with DOE response. The audience for NESHAP compliance tables would seem to be primarily the *regulators*. Adding a row to the bottom of the table to aid in our review of all air emission quality factors, does not seem to be an unacceptable request.

5. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg. #: Line #: Code: C
Original Comment #: 19
Comment: Disagree with DOE response. The statement "... is not likely to aid in the efficient review of data," is inappropriate. Ohio EPA's request to add additional graphics was made to show differences between background and fence line concentrations with one "look," rather than paging between different figures. The latter seem inefficient. The inference that the reviewer may not be able to observe the difference between a biweekly and a quarterly composite sample is inappropriate.