



State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

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August 9, 2000

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

**RE: 1999 ISER COMMENTS**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's *1999 Integrated Site Environmental Report (May 2000)* and included comments.

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

Sincerely,

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

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

1999 Integrated Site Environmental Report  
May 2000, 51350-RP-0010, Rev. 0, Final.

Comments:

1. Commenting Organization: Ohio EPA                      Commentor: DSW  
Section #: General Pg #: NA      Line #: NA      Code: C  
Original Comment #:  
Comment: The method of numbering the pages is inconsistent, some appearing on the outside edges of the pages and some on the inside edges. It is much preferred to have the numbering on the outside edges as it makes it much easier to locate a particular page when leafing through the document.
  
2. Commenting Organization: Ohio EPA                      Commentor: DSW  
Section #: Executive Summary/4.3.2.2 Pg #: ES-3/78 Line #: NA Code: C  
Original Comment #:  
Comment: This section states that "No additional exceedances occurred after April 1999 due to operation improvements at the new sewage treatment plant." This would lead the reader to believe that no more exceedances are likely to occur. However, the 1<sup>st</sup> Quarter 2000 report states that additional TSS exceedances were experienced at the sewage treatment plant during the first quarter of 2000. This statement (and those on page 78) should be limited to 1999 (eg "Exceedances of the total suspended solids limit accounted for the permit excursions observed in the first quarter of 1999. No additional exceedances occurred during 1999 after due to operation improvements at the new sewage treatment plant." As written in the 1999 Annual Report, the information could be construed as misleading the reader into believing the problems had been permanently corrected when in fact they weren't and that the site was aware of the continued problems with TSS at the time of publication of this document since they occurred in early 2000.
  
3. Commenting Organization: Ohio EPA                      Commentor: DSW  
Section #: Executive Summary Pg #: ES-5 Line #: NA Code: C  
Original Comment #:  
Comment: The statement is made that "...there was no impact because of their relatively short duration." This seems to be conjecture as I am unaware of any studies on the impacts (or lack thereof) of short duration sediment loads on the competitive advantages of Rusty vs Sloan's crayfishes. Please provide support for this statement.

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4. Commenting Organization: Ohio EPA Commentor: DSW  
Section #: 4.4 Pg #: 81 Line #: Table 4-4 Code: C  
Original Comment #:  
Comment: It would be helpful to have the sampling station code shown on Figure 4-9 with the sampling location names on this table (eg Great Miami River, North of the Effluent Line (G2)).
  
5. Commenting Organization: Ohio EPA Commentor: DSW  
Section #: Appendix E Pg #: E-2 Line #: Table E-1 Code: C  
Original Comment #:  
Comment: This table only shows part of the co-located results. For example, in addition to Radium 226, Ohio EPA also analyzed sediment at P1 for total uranium yet only the results for Radium 226 are shown; in addition to SWR-01, SWP-03 is the same as Ohio EPA sampling location PR1.8 but no results are shown in this table. Please explain.
  
6. Commenting Organization: Ohio EPA Commentor: DSW  
Section #: Appendix B.1 Pg #: B1-3 Line #: NA Code: C  
Original Comment #:  
Comment: There has been an ongoing problem with obtaining samples from some locations (eg. SWD-03) and a plan is presented to eliminate these problems. However the 1<sup>st</sup> quarter 2000 report indicates these problems have not yet been resolved as samples are still not being collected. Please explain.
  
7. Commenting Organization: Ohio EPA Commentor: DSW  
Section #: Appendix B Pg #: B1.4-B1.5 Line #: NA Code: C  
Original Comment #:  
Comment: The statement is made that key sample locations associated with areas of direct infiltration to groundwater are SWP-02, SWD-02. And SWRB 4002O and that only SWD-02 had total uranium ground water FRL exceedances so that it is not likely there were any cross media impacts to the GMA. It is clear that downstream of SWD-03 the surface water passes directly into the GMA and that samples from this location generally exceed the FRL. This is one reason that this station is so important to sample but continues to be missed. It is unclear why SWD-03 and STRM 4005 are not included in the description of the key sample locations, but are listed as monitoring points that will be included in future IEMP reports with respect to cross media issues. Please explain.

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8. Commenting Organization: Ohio EPA Commentor: DSW  
Section #: Appendix B.1 Pg #: B1-8 Line #: NA Code: C  
Original Comment #:  
Comment: We have never seen data from discharges of this storm water pond. Has it never been pumped out? Please explain. Please provide information on the dates it has been pumped, where the discharge went, and results of samples taken.
9. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.  
Section #: Attachment A.1 Pg.#: Figure A.1-3 Line #: NA Code: C  
Original Comment #:  
Comment: The text box applying to the concentration spikes observed in early April, May, and July indicates three possible causes for the spikes. Did all three apply in each case? For example, it seems unlikely that inadvertent labeling of sample bottles would cause the multiple, back-to-back spikes seen in May and July.
10. Commenting Organization: OEPA Commentor: HSI  
GeoTrans, Inc.  
Section #: Attachment A.2 Pg.#: A.2-4 Line #: 7 Code: C  
Original Comment #:  
Comment: After removing sediment from the well and cleaning the pump, is the well turbidity now anticipated to be less than 5 NTU for future quarterly sampling? Do the turbid conditions persist even after the cleaning?
11. Commenting Organization: OEPA Commentor: HSI  
GeoTrans, Inc.  
Section #: Attachment A.2 Pg.#: A.2-4 Line #: 9 Code: C  
Original Comment #:  
Comment: What is the basis for stating that the high concentrations are turbidity related when a 0 NTU sample yielded a concentration of 45.15 ug/L?