



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich
Governor

FILE: _____
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August 10, 2000

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

RE: COMMENTS PSP FOR PILOT PLANT DRAINAGE DITCH PUMP TEST

Dear Mr. Reising:

This letter provides as an attachment Ohio Environmental Protection Agency comments on the Project Specific Plan for Pumping Test, Pilot Plant Drainage Ditch Plume Area. These comments are provided in the standard format and refer to specific issues in the Plan. In addition, this letter will serves to outline our understanding of decisions and discussions that occurred during the Ohio EPA inspection on August 9, 2000 and also to outline future actions.

Handouts Provided to Ohio EPA

- A list of Pumping Test Issues
- A map with predicted drawdown and the locations of Monitor Wells 21064 and 2384
- A bulleted list of Site Management items
- A site plan showing the site access routes, tree stockpile location, routing of hoses carrying pump test water to CB-291, and silt fence location

Field Re-Location of Two Wells

Everyone present agreed to re-locate monitor well 32765 to within five feet of the control well. This well penetrates the blue clay confining layer and is not expected to be affected by the pump test.

Monitor well 32766 was moved another 50 feet farther from the control well. This monitor well will now be located 100 feet from the control well. The approximate

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location was field marked and the precise location will be surveyed in.

Additional Monitoring Wells

- Existing monitor well 21064 located between the Southfield Module and the test well and monitor well 2042 located to the northeast of the test well will be used to evaluate the effects of the Southfield Extraction wells and the old water supply wells on the drawdown.

Ecological Considerations for Site Management

- Only trees marked with yellow or red tape will be removed
- Trees with painted white stripes will be saved.
- Trees will be cut close to the ground and the stumps will remain. Downed trees will be strapped and dragged to the clearing where they will be stockpiled. Trees will only be pushed when it is not feasible to drag them.
- No soil grubbing will occur, but a bush hog or weed-whacker can be used to remove brush as needed.
- Silt fencing as shown in the provided sketch goes across the grade contours. Properly installed silt fencing follows grade contours. Persons experienced in the Storm Water and Erosion Control Plan will field-locate silt fencing as necessary after the area has been disturbed.
- After the pump test is completed, disturbed areas will be back-bladed to smooth out ruts and disturbed areas will be re-seeded with permanent seed mix.
- Vehicle traffic to drilling area will be limited to the drilling equipment and tool vehicle. Other vehicles are required to use the parking area.

Future Actions

- Changes to the PSP will be accomplished by Contract Variances. The variances will be submitted for Ohio EPA review and approval.
- We have reached conceptual agreement on several of the issues, such as heavy rainstorms, loss of electric power, or inability to pump to the Storm Water Retention Basin, that would cause the test to be canceled or postponed. An Action Plan should be submitted for review and approval. The Action Plan should, as much as is practical, quantify and detail the conditions necessary for a successful test. We expect the Action Plan to address such complicating factors as; fluctuations in background water levels in monitoring wells; when flow in Paddy's Run will interfere action levels in the monitor wells which ascertain the influence of Paddy's

Mr. Johnny Reising
August 10, 2000
Page 3

Run, and similar complications that would cause the test to be cut short.

If you have any questions, please contact Tom Ontko or me.

Sincerely,



for

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

- cc: Jim Saric, U.S. EPA
- Terry Hagen, FDF,
- Mark Shupe, HSI GeoTrans
- Francie Hodge, Tetra Tech EM Inc.
- Ruth Vandergrift, ODH

