



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

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August 23, 2000

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

RE: MONITOR WELL 3027 PUMPING ACTION

Dear Mr. Reising:

The Ohio Environmental Protection Agency was provided a summary of the proposed pumping action at Monitor Well 3027 via facsimile transmission on August 14, 2000. This proposal was also discussed in the draft "Conceptual Design for Remediation of the GMA in the Waste Storage and Plant 6 Areas". We conceptually agreed at the June 13, 2000 meeting that behavior of MW 3027 was sufficiently anomalous that investigation is warranted. We offer the following as items to be included in an action plan:

1. Prior to the start of the pumping action, a downhole camera survey should be performed to verify the integrity of the well casing.
2. What pump rate is targeted and what type of pump will be used? Will the action continue around the clock or will it be an 8 hour per day activity.
3. Have efforts been made to re-develop or surge the well? Are any such efforts planned for this action? At the least, sediment should be removed from the bottom of the casing.
4. We all agree that interpreting results from poorly developed wells is problematic. If this well still gives turbid water after the Action, it should be removed from the monitoring network.

The Ohio Environmental Protection Agency oversight activities have matured over the years to the extent that we are examining many of the FEMP activities in great detail. In

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the Soils Project, for example, we review Certification Design Letters which detail the sampling strategies necessary to declare that soils have been remediated. We additionally examine variances to the sampling plans which frequently involve only small changes in sample locations. As a further example, during the construction of Cell 1 of the On-Site Disposal Facility, it proved impractical for the FEMP to distinguish between significant changes (those which impact Ohio ARARs) and trivial changes. As a consequence, a program was initiated in which we review and approve all DCNs and RCIs as well as details of the Impacted Material Placement Plan. In our view, this has been a successful means of complying with the Amended Consent Decree and to our knowledge our expedited reviews have not resulted in any significant delays to the project.

Ohio EPA seeks to bring a similar depth of review to the Aquifer Restoration Project. This letter transmits our requirements for the Monitor Well 3027 Pumping Action Plan and we have previously fast-tracked our comments on the Pilot Plant Drainage Ditch Pump Test. In the future, the FEMP should submit for review and approval detailed work plans for all activities such as the following:

- A. tests to determine aquifer properties such as Kd, hydraulic conductivity, and other physical and chemical properties of the aquifer which factor into the design of remediation systems
- B. investigations such as direct-push wells and traditional monitor well installations which characterize or refine the vertical and/or horizontal extent of the contamination
- C. improvements to the groundwater model

The Ohio Environmental Protection Agency has grown to respect the technical abilities of the personnel of the Aquifer Restoration and Waste Water Treatment Project. Considering the inherent uncertainties of understanding the dynamics of the Great Miami Aquifer, we have a high degree of confidence that the nature and extent of contamination have been defined to adequately protect human health and the environment. The Project has also been pro-active in the deployment of innovative technologies (re-injection) and has been aggressive in expediting active remediation (accelerating the placement of extraction wells in the South Field and the planned wells in the Pilot Plant drainage ditch). We offer these comments and list our requirements in the expectation that our working relationships will

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continue to improve.

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

Sincerely,

Tom Ontko

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