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5-408.1

**DISAPPROVAL - PSP SOUTHFIELD EXTRACTION SYSTEM (DOE FEMP
MSL #531-0197)**

06/07/95

**OEPA DOE-FN
3
COMMENTS**



State of Ohio Environmental Protection Agency

Southwest District Office

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I-2640

JUN 10 1995

George V. Voinovich
Governor

June 7, 1995

RE: DOE FEMP
MSL 531-0297
DISAPPROVAL - PSP
SOUTHFIELD EXTRACTION SYSTEM

Mr. Jack Craig
Project Manager
US DOE FEMP
P. O. Box 398705
Cincinnati, OH 45239-8705

Dear Mr. Craig:

Ohio EPA has reviewed DOE's "Project Specific Plan for the Installation of the South Field Extraction System" submitted on May 19, 1995. Ohio EPA has significant concerns with the scope and goals of the plan.

The DOE has performed a pumping test in the area of the proposed system. It is our understanding that data evaluation is not completed at this time. In order to design an adequate system, while minimizing the overall cost, it is imperative that this data be analyzed and the system be designed based upon this site specific data. The current south plume extraction system was designed without the use of site specific data, resulting in the installation of an inefficient system. We believe it is in Ohio EPA's and DOE's best interest to avoid repeating this kind of costly mistake.

Ohio EP is sensitive to the need to move forward on the project in an expeditious manner so that available funding may be utilized. However, we have many general questions regarding the placement of wells, the construction materials, incorporation of the well placement in a hydraulic push-pull system, and the over-all incorporation of the PSP into the final OU5 remedy. As always, we are available to schedule any necessary meetings to expedite the resolution of our concerns. Please contact Mike Proffitt or me if you have any questions.

Sincerely,

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

THOMAS A. SCHNEIDER
FERNALD
RESPONSE
JUN 10 1995

Attachment

cc: Jim Saric, U.S. EPA
Terry Hagen, FERMCO

Manager, TPSS/DERR,CO
Lisa August. GeoTrans

Ruth Vandergrift, ODH
Sharon McClellan, PRC

**COMMENTS ON PROJECT SPECIFIC PLAN FOR THE INSTALLATION OF THE
SOUTH FIELD EXTRACTION SYSTEM**

- 1) Commenting Organization: Ohio EPA Commentor: TMO
Section #: Pg #: Line #: Code: g
Original Comment #:
Comment: The Ohio EPA would prefer to utilize the capabilities of our in-house Geographic Information Systems (GIS) to the fullest extent practicable. Please provide tape or disk copies of all maps or drawings produced in this document to the OFFO GIS manager, Randy Earle. We would like those maps and drawings which were produced with the Intergraph system as well as all other maps which were produced by other software packages. Mr. Earle may be reached by phone at (513)-285-6038.
Response:
Action:
- 2) Commenting Organization: Ohio EPA Commentor: TMO
Section #: Figure 1-2 Pg #: 6 Line #: Code: c
Original Comment #:
Comment: It is not clear why procurement of a Pipeline System Contractor doesn't begin until October, 1995 and why this procurement should require six months. The procurement of the wellfield contractor takes less than six weeks.
Response:
Action:
- 3) Commenting Organization: Ohio EPA Commentor: TMO
Section #: 4-3 Pg #: 24 Line #: bullet 3 Code: c
Original Comment #:
Comment: Please give a reference in the QAPP for the procedure to collect soil samples from the rotosonic core.
Response:
Action:
- 4) Commenting Organization: Ohio EPA Commentor: DDAGW
Section #: 4.1 Pg #: 17 Line #: Code:
Original Comment #:
Comment: The document does not include the technical justifications for locating the proposed extraction/ injection wells in this system. The basis for the system design and well placement are unclear. The PSP fails to discuss re-injection and how the system was designed to evaluate re-injection during operations. Additionally, the document does not discuss how data generated will meet the needs of the technology development program. This section also makes no mention of the results of the recent pumping test, projected capture zones, or any detailed description of hydrogeologic properties.
Response:
Action:
- 7) Commenting Organization: Ohio EPA Commentor: DDAGW
Section #: 4.2 Pg #: Figure 4-3 Line #: Code:
Original Comment #:

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June 7, 1995
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Comment: We are unable to discern the reason(s) for the areas on the map being labeled "Area to be protected. Do not disturb. No excavation..

8) Commenting Organization: Ohio EPA Commentor: DDAGW
Section #: 4.3 Pg #: 24 Line #: 24-30 Code:
Original Comment #:

Comment: This description of ground water sampling is not clear. Does DOE intend to take samples from inside of a monitoring well using a packer and a well point, as stated in the paragraph, or will samples be taken from the bore hole, as the boring is advanced? Has a methodology for this sampling technique been defined in the QAPP?

11) Commenting Organization: Ohio EPA Commentor: TMO
Section #: 9.0 Pg #: 30 Line #: Code: c
Original Comment #:

Comment: Please provide a complete reference in this section for the document "General Methods for Remedial Operation Performance Evaluations for Pump-and-Treat Remediation". This document is referred to on page4, line 22.

Response:

Action: