



State of Ohio Environmental Protection Agency

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D-0235  
0446-7A

November 20, 2002

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

**RE: Integrated Environmental Monitoring Plan 2002 Annual Plan Rev 3A**

Dear Mr. Reising:

Ohio EPA has reviewed the Integrated Environmental Monitoring Plan 2002 Revision 3A Draft Final (2505-WP-0022) along with the Summary of Proposed Technical Changes submitted by DOE on October 8, 2002. Ohio EPA's comment's on the IEMP 2002 Rev 3A and Technical Changes are enclosed.

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 Hodge, Tetrattech
- Ruth Vandegrift, ODH
- Mark Schupe, HSI Geotrans

**INTEGRATED ENVIRONMENTAL MONITORING REPORT  
(2505-WP-0022) Revision 3A Draft Final**

**Comments:**

1. Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: 3.2.2 Pg. #: 3-6 Line #: na Code: C  
Original Comment #:

Comment: Although a public water supply is now available, a groundwater dose assessment may be useful for tracking the effectiveness of the groundwater remediation effort. Since historical dose assessments for groundwater are available, a trend can be shown to demonstrate how potential dose has been reduced during groundwater remediation. DOE needs to discuss the proposed elimination of groundwater dose assessment with members of the public.

2. Commenting Organization: OEPA Commentor: GeoTrans, Inc.  
Section #: 3 Pg. #: 3-14 Line #: 34 Code: E  
Original Comment #:

Comment: Change "were attributed to"; to "were attributed to":

3. Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: Figure 3-3 Pg. #: 3-15 Line #: Code: c  
Original Comment #:

Comment: Check the indicated location of the injection basin in this figure. The indicated location is somewhat to the north west of the actual location.

4. Commenting Organization: OEPA Commentor: GeoTrans, Inc.  
Section #: 3 Pg. #: 3-17 Line #: 2 Code: C  
Original Comment #:

Comment: Please provide well construction details for the following wells: 33263, 33061, 33253, 33254, 33255, 32761, 33062, and 33063. Well construction information could not be located on the Fernald Extranet Site.

5. Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: 3.4.2.2 Pg. #: 3-18 Line #: 4<sup>th</sup> from top of page Code: C  
Original Comment #:

Comment: The text states, "Four of the five aquifer zones (Aquifer Zones 1 through 4) contain aquifer restoration modules." Figure 3-4 does not show a module in Zone 3.

6. Commenting Organization: OEPA Commentor: GeoTrans, Inc.  
Section #: 3 Pg. #: 3-20 Line #: 13 Code: E  
Original Comment #:

Comment: Remove comma after "locations."

OHIO EPA's Comments on IEMP Rev 3A  
 November 20, 2002  
 Page 2

7. Commenting Organization: OEPA Commentor: GeoTrans, Inc.  
 Section #: 3 Pg.#: 3-28, Table 3-4 Line #: NA Code: C  
 Original Comment #

Comment: Please provide well construction details for the following monitoring wells: 22204, 22205, 22199, 31217, and 82433. Well construction information could not be located on the Fernald Extranet Site.

8. Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: Figure 3-7 Pg. #: 3-39 Line #: Code: c  
 Original Comment #:

Comment: The symbol for the direct push sampling locations is poorly reproduced in our copies of this plan and it cannot be distinguished from a filled-in circle.

9. Commenting Organization: OEPA Commentor: GeoTrans, Inc.  
 Section #: 3 Pg.#: 3-41 Line #: 5 Code: E  
 Original Comment #

Comment: Remove "1" after "Exceedances."

10. Commenting Organization: OEPA Commentor: GeoTrans, Inc.  
 Section #: 3 Pg.#: 3-57 Line #: 23 Code: C  
 Original Comment #

Comment: The model discussion in Section 3.7.1 should be updated to clearly document the following:

- DOE's transition from the Sandia Waste Isolation Flow and Transport (SWIFT) Model to the Variably Saturated Analysis Model in 3-Dimensions (VAM3D) Model for all site modeling operations.
- How the site wide model (referenced in Figure 3-9 and in the model calibration discussion on Page 3-59) will relate to the ZOOM model for the purposes of this plan, specifically with regard to any flow model re-calibration activities.
- The relationship between the ZOOM model and the site wide model with regard to future modeling performed in support remedial design.

11. Commenting Organization: OEPA Commentor: GeoTrans, Inc.  
 Section #: 3 Pg.#: 3-59 Line #: 3 Code: C  
 Original Comment #

Comment: The text is misleading because it implies that transient water levels were simulated using the model. All of the models assumed steady-state conditions (i.e., the "wet," "dry," and

