



State of Ohio Environmental Protection Agency

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April 7, 2003

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

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RE: ADDITIONAL COMMENT ON MID-YEAR 2002 IEMP DATA SUMMARY REPORT

Dear Mr. Reising:

This letter provides an additional comment on the 2002 Mid-Year IEMP Data Summary Report. We do not intend to begin another comment/response cycle. Additional dialog on this topic can resume with the next IEMP Data Summary Report.

In response to our question on the origins of flow into the Leak Detection System of Cell 1 of the OSDF, DOE concluded that these flows must be coming through defects in the secondary liner. Flows through the secondary liner would require perched water to move upward through three feet of compacted clay, a geosynthetic clay liner and a geomembrane liner. We suspect that most of the flows observed in Cell 1 are coming from holes in the gml component of the primary liner. Defects in geomembrane liners have been reported in landfills with a high level of third-party CQA. We agree that the perched system is too low to overflow the bottom liner and from the cell perimeter.

The Ohio EPA will continue to evaluate flows from all the OSFD cells and will comment in future IEMP Data Summary Reports.

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

Sincerely,

For Tom Ontko

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

- cc: Jim Saric, U.S. EPA
- Terry Hagen, Fluor Fernald
- Mark Shupe, GeoTrans, Inc.
- Michelle Cullerton, Tetra Tech EM Inc.
- Ruth Vandergrift, ODH