OhioEPA

State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 **FAX:** (937) 285-6404

Bob Taft, Governor
Maureen O'Connor, Lt. Governor
Christopher Jones, Director

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October 22, 2003

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

RE: RtC's ON THE TRANSMITTAL OF RESPONSES TO OEPA's COMMENTS ON THE 2002 SITE ENVIRONMENTAL REPORT

Dear Mr. Reising:

Ohio EPA has reviewed the Responses to the Ohio Environmental Protection Agency Comments on the 2002 Site Environmental Report (2002 Environmental Summary) 51350-RP-0022 Rev 0 Final submitted by DOE on September 19, 2003. Ohio EPA's comment's are enclosed.

If there are any questions, please contact me at (937) 285-6466 or Donna Bohannon at (937) 285-6543.

Sincerely,

Donna Bohannon for

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

cc: Jim Saric U.S. EPA
Terry Hagen, Fluor Daniel Fernald
Francis Hodge, Tetratech
Ruth Vandegrift, ODH
Mark Schupe, HSI Geotrans

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2002 Site Environmental Report
2002 Environmental Summary (51350-RP-0022) Rev 0 Final

Comments:

1. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: Attachment A.1 Pg.#: A.1-4 Line #: 30 Code: C
Original Comment #: 1
Comment: DOES' original statement was that chromium (VI) is not present in the aquifer at the FEMP and that Eh-pH conditions measured in the aquifer is not oxidizing enough to support the presence of chromium (VI). However, geochemical data from re-injection well vicinity groundwater shows that at least some potential exists for the presence of chromium (VI). The statement that instantaneous reduction kinetics must be assumed regarding the fate of any chromium (VI) present in the groundwater is misleading. As re-injection continues, the aquifer volume geochemically impacted by re-injection will become large enough to approach a steady state. Given the magnitude and duration of the site re-injection operation, the impacted volume could be extensive and the oxidation change could be long term. Thus, given sufficient time, chromium either in solution or in a solid phase on the aquifer grains could oxidize and become mobile as chromium (VI). The time required for the reactions depends on the geochemical parameters of the site and the specific modes of chromium (III) occurrence (the indigenous mineral species present, etc.).

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