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Department of Energy

Ohio Field Office
Fernald Environmental Management Project
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MAR 29 2004

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0214-04

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Ms. Val Orr
Ohio Environmental Protection Agency
Division of Drinking and Ground Waters – UIC Unit
P.O. Box 1049
Columbus, OH 43216-1049

Dear Mr. Saric, Mr. Schneider, and Ms. Orr:

**TRANSMITTAL OF RESPONSE TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENT ON THE FOURTH QUARTER 2003 RE-INJECTION OPERATING REPORT**

- References:
- 1) Letter, T. Schneider to W. Taylor, "Comment on Fourth Quarter 2003 Re-Injection Operating Report," dated March 9, 2004
 - 2) Letter, J. Saric to J. Reising, "Fourth Quarter Aquifer Reinjection Report," dated March 4, 2004
 - 3) Letter DOE-0152-04, W. Taylor to J. Saric, T. Schneider, V. Orr, "Fourth Quarter 2003 Re-Injection Operating Report for the Fernald Closure Project," dated February 12, 2004

The purpose of this letter is to transmit the response to the Ohio Environmental Protection Agency (OEPA) comment on the Fourth Quarter 2003 Re-Injection Operating Report (Reference 1) for review and approval by the OEPA. This report was approved by the United States Environmental Protection Agency (USEPA) as noted in Reference 2.

MAR 29 2004

DOE-0214-04

Mr. James A. Saric
Mr. Tom Schneider
Ms. Val Orr

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If you have any questions or need further information, please contact Dave Lojek at (513) 648-3127.

Sincerely,



WJ William J. Taylor
Director

FCP:Lojek

Enclosure: As Stated

cc w/enclosure:

D. Lojek, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosure)
V. Orr, OEPA-Columbus
G. Jablonowski, USEPA-V, SR-6J
M. Cullerton, Tetra Tech
F. Bell, ATSDR
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

K. Johnson, OH/FCP
J. Reising, OH/FCP
R. Abitz, Fluor Fernald, Inc./MS64
K. Broberg, Fluor Fernald, Inc./MS52-5
J. Chiou, Fluor Fernald, Inc./MS64
T. Hagen, Fluor Fernald, Inc./MS1
E. Henry, Fluor Fernald, Inc./MS52-5
W. Hertel, Fluor Fernald, Inc./MS52-5
M. Kopp, Fluor Fernald, Inc./MS52-5
T. Poff, Fluor Fernald, Inc./MS65-2
D. Powell, Fluor Fernald, Inc./MS64
ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSE TO OHIO ENVIRONMENTAL
PROTECTION AGENCY COMMENT
ON THE FOURTH QUARTER
2003 RE-INJECTION OPERATING REPORT**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

MARCH 2004

U.S. DEPARTMENT OF ENERGY

**RESPONSE TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENT
ON THE FOURTH QUARTER 2003 RE-INJECTION OPERATING REPORT**

SPECIFIC COMMENT

1. Commenting Organization: Ohio EPA
 Section #: Pg #: Line #: Commenter:
 Original Specific Comment #: 1 Code:
- Comment: The Quarterly Re-Injection Operating Reports provide target and average operating rates for the re-injection wells (see Table 2). For the first time, this report also summarizes the target and operational parameters for the Injection Pond, which became operational in July 2003. The target injection rate for the pond is 100 gpm and the average rate during the actual period of injection is reported as 89 gpm. We have two questions:
- 1) How was the target injection rate of 100 gpm determined?
 - 2) How was the average rate of 89 gpm measured?
- Response: The Injection Pond became operational on July 27, 2003. The Fourth Quarter 2003 Re-Injection Operating Report was not the first report issued with Injection Pond operational data. Operation of the Injection Pond was first reported in the Third Quarter 2003 Re-Injection Operating Report.
- A target re-injection rate of 100 gpm was determined by considering: 1) groundwater remediation modeling results found in the South Field (Phase II) Design, 2) how the water would be delivered to the pond, 3) uncertainties in knowing if the pond would fill up and overflow, and 4) discharge limit considerations at the Parshall Flume.
- The average rate of 89 gpm was calculated as described in Footnote F of Table 2. It is the Gallons Injected / (Hours Injecting x 60). Gallons injected and hours injecting are given in Table 2 for the Injection Pond.
- Action: No action required.