



Department of Energy

Ohio Field Office  
Fernald Closure Project  
175 Tri-County Parkway  
Springdale, Ohio 45246



JUL 13 2006

Mr. James A. Saric, Remedial Project Manager  
United States Environmental Protection Agency  
Region V-SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0166-06

Mr. Thomas Schneider, Project Manager  
Ohio Environmental Protection Agency  
Southwest District Office  
401 East Fifth Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO OHIO ENVIRONMENTAL PROTECTION  
AGENCY COMMENTS ON THE STORM SEWER OUTFALL DITCH INFILTRATION  
TEST REPORT, FINAL, REVISION 0**

Reference: Letter, T. Schneider to J. Reising, "Comments on Responses to Comments on  
the Storm Sewer Outfall Ditch Infiltration Test Report, Final, Revision 0," dated  
May 22, 2006

Enclosed for your review and approval are the subject responses.

If you have any questions concerning this transmittal, please contact me at (513) 648-3139.

Sincerely,

Johnny W. Reising  
Director

Enclosure: As Stated

Mr. James Saric  
Mr. Thomas Schneider

-2-

DOE-0166-06

cc w/enclosure:

J. Powell, DOE-LM/FCP  
Edward Skintik, DOE-OH  
C. Jacobson, Stoller  
M. Lutz, Stoller  
M. Miller, Stoller, MS2  
M. Cullerton, Tetra Tech  
S. Helmer, ODH  
G. Jablonowski, USEPA-V, 5HRE-8J  
T. Schneider, OEPA-Dayton (3 copies of enclosure)  
M. Shupe, HSI GeoTrans  
T. Tucker, OEPA-Columbus

cc w/o enclosure:

R. Abitz, Fluor Fernald, Inc., MS88  
K. Broberg, Ajilon, MS12  
J. Chiou, Fluor Fernald, Inc., MS88  
B. Hertel, Fluor Fernald, Inc., MS12  
F. Johnston, Fluor Fernald, Inc., MS12  
P. Mohr, Fluor Fernald, Inc., MS1  
C. Tabor, Stoller, MS12  
T. Terry, Fluor Fernald, Inc., MS1  
K. Voisard, Stoller MS12

**RESPONSES TO  
OHIO ENVIRONMENTAL PROTECTION AGENCY  
RESPONSES TO COMMENTS ON THE  
STORM SEWER OUTFALL DITCH INFILTRATION  
TEST REPORT**

**FERNALD CLOSURE PROJECT  
FERNALD, OHIO**

**JULY 2006**

**U.S. DEPARTMENT OF ENERGY**



2. Commenting Organization: OEPA

Commenter: GeoTrans, Inc.

Section #: 7.0

Pg #: 7

Paragraph #: 13 (revised)

Code: C

Original Comment #: NA

Comment: DOE's suggestion that SSOD re-injection be continued only as long as existing wells, pumps, or motors are serviceable is insufficient to accurately determine the benefit or lack thereof of this component of the groundwater remedy. In order to accurately ascertain the impact of the re-injection, some minimum number of concentration measurements from site monitoring wells in the SSOD vicinity are needed (10 for example). Given the semi-annual frequency for groundwater monitoring, 10 monitoring events will require a period of five years. The decision to suspend SSOD re-injection should be made only after the minimum amount of monitoring data have been collected and analyzed, not on the basis of equipment service l

Response: As explained in response to Comment 1 above, aquifer remedy progress near the SSOD will be assessed annually in the Site Environmental Report. It may be difficult to differentiate the direct benefit to the aquifer remedy being achieved solely from the SSOD pumping and re-injection operation, but unless it can be proven that no benefit is being gained the pumping will continue. Should the existing wells, pumps, and motors become unserviceable prior to a determination being made on the direct benefit gained by the aquifer remedy because of the pumping and re-injection, continuance of the pumping will be re-evaluated, and US EPA and Ohio EPA concurrence on a path forward will be obtained.

Action: As stated in the response.