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February 23, 2005

Mr. William Taylor  
US Department of Energy  
Ohio Field Office  
Fernald Closure Project  
175 Tri County Parkway  
Springdale, Ohio 45246

**RE: COMMENT - RESPONSES TO OEPA'S COMMENTS ON THE IEMP REV 4  
AND ASSOCIATED CHANGE PAGES**

Mr. Taylor:

Ohio EPA has reviewed DOE's Transmittal of Responses To Ohio Environmental Protection Agency Comments on the Integrated Environmental Monitoring Plan (IEMP), Revision 4 Final (2505-WP-0022) and Associated Change Pages dated January 20, 2005. Ohio EPA's comment is 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  
Michelle Cullerton, Tetratech  
Ruth Vandegrift, ODH  
Mark Schupe, HSI Geotrans

**RESPONSES TO OHIO EPA COMMENTS ON THE  
IEMP, REV 4 AND ASSOCIATED CHANGE PAGES****Comments:**

1. Commenting Organization: Ohio EPA                      Commentor: Geo Trans, Inc.  
Section #:                      Pg. #:                      Line #:                      Code: C  
Original Comment #: Specific Comment# 6

Comment: The original comment was written with the impression that the point comparisons would include monitoring wells. DOE, however, only discusses point comparisons with respect to measured versus predicted extraction well concentrations. Final certification of an aquifer cleanup will rely on point measurements taken in monitoring wells and possibly drive point measurements located remote from the extraction wells. What is DOE's current assessment of how closely model predictions compare with measured concentrations in monitoring (not extraction) wells since the IEMP Revision 3 was issued? The degree to which the model agrees with the monitoring well data is a better measure of model accuracy than only relying on comparisons to extraction well data.