



State of Ohio Environmental Protection Agency

Southwest District

LOG

F-00700

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Bob Taft, Governor
Bruce Johnson, Lt. Governor
Joseph P. Koncelik, Director

FILE: 6446.6c19

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June 21, 2005

Mr. William Taylor
US Dept of Energy
Ohio Field Office
Fernald Closure Project
175 Tri County Parkway
Springdale, Ohio 45246**RE: ADDITIONAL COMMENTS - DRAFT COMPREHENSIVE LEGACY
MANAGEMENT AND INSTITUTIONAL CONTROLS PLAN**

Dear Mr. Taylor:

Due to an oversight in the editing phase of Ohio EPA's comments, Geotrans' comments were inadvertently left out of Ohio EPA's original comment letter. Please consider the attached comments as additions to Ohio EPA's comments on the LMICP. To aid in responding, comment numbering starts where our previous letter stopped. I apologize for any inconvenience this may cause.

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 Oversightcc: Jim Saric U.S. EPA
Michelle Cullerton, Tetratich
Mark Schupe, HSI Geotrans
Ken Alkema, Fluor Fernald

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propose a quantitative limit that would trigger the process for consideration of a parameter for addition the LCS indicator monitoring list.

115. Commenting Organization: OEPA
Section #: 4.4.3.2
Original Comment#

Pg #: 4-28

Commenter: GeoTrans, Inc.
Line #: 14
Code: C

Comment: The three confirmatory sample requirement implies that a LDS parameter will need to be detected in four straight annual samples before it will be considered for addition as a supplemental indicator parameter. Since the annual 16 parameter LDS indicator parameter list (Table 4-5) is already based on a careful assessment of what the likely parameters of concern are, if a new parameter from this list is detected in an annual sample, it should be added immediately to the quarterly LDS supplemental parameter list for the next three quarters. Decisions of whether to discontinue or continue quarterly monitoring for that parameter in the LDS or to expand quarterly monitoring for it to the next lower horizon would then be based on these additional three quarters for that parameter.