



State of Ohio Environmental Protection Agency

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2005 NOV 28 A 3:10

FILE: 6446.7

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November 22, 2005

Mr. Johnny Reising
US Dept of Energy
Ohio Field Office
Fernald Closure Project
175 Tri County Parkway
Springdale Ohio 45246

RE: COMMENT - TRANSMITTAL OF RfCs TO OEPA ON THE 2004 SER

Mr. Reising:

Ohio EPA has received DOE's "Transmittal Of Responses To The Ohio Environmental Protection Agency Comments On The 2004 Site Environmental Report" dated October 20, 2005. Ohio EPA has reviewed the responses and our comment is enclosed.

If there are any questions, please contact me or Donna Bohannon.

Sincerely,

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

cc: Jim Saric, U.S. EPA
Mark Shupe, HSI GeoTrans
Michelle Cullerton, Tetra Tech Inc.

**Ohio's Comment on The
2004 SER**

Comment:

1. Commenting Organization: OEPA

Commenter: GeoTrans, Inc.

Section #: Attach. A.5

Pg #: A.5-12

Line #: 24

Code: C

Original Comment#5

Response: DOE indicates that labile elements will be released to the solution quickly (e.g., B, Li, CL, NO₃, etc). At the OSDF, any boron concentration increases resulting from the dolomite gravel used in the construction of the facility would, therefore, likely occur during the first or second flush of the gravel pore volume. Significant releases of boron from the gravel with followup pore water flushes would not be anticipated. The experiment should continued, therefore, by replacing the initial de-ionized water with fresh de-ionized water after the first 90 days, and monitoring additional leaching. Samples of the water should then be collected and analyzed as before (after 30, 60, and 90 days). The concentrations measured in this second flush of the sample gravel would be more representative of the boron concentrations that would be observed in the LCS, LDS, and horizontal till wells after the initial flush.