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November 28, 2005

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

RE: COMMENTS ON GROUNDWATER CERTIFICATION STRATEGY

Mr. Reising:

This letter provides Ohio EPA's comments on Revision 0 of the Fernald Groundwater Certification Plan.

If there are any questions, please contact me at (937) 285-6466 or Tom Ontko at (937) 285-6090.

Sincerely,

Tom Ontko

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

cc: Jim Saric U.S. EPA
Michelle Cullerton, Tetrattech EMI
Mark Shupe, Geotrans, Inc.



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- 6) Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
 Section #: 5.2 Pg #: 5-1 Line #: 12 Code: C
 Comment: Here and elsewhere in the text revise to indicate that it is FRL *constituent* concentrations that slowly rebound, etc., not FRL concentrations, which are constant values specified in the OU 5 ROD.
- 7) Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
 Section #: 5.3.3 Pg #: 5-2 Line #: 24 Code: C
 Comment: If the purpose of a controlling document is to provide a plan for agency review prior to the actual performance of a given field activity, the IEMP is poorly suited as the controlling document for Stage II monitoring. Unless Stage II monitoring for each module is coordinated with the annual IEMP review and comment cycle, the specific planning details for each Stage II monitoring event will likely only be available for review after the work is completed, since Stage II only lasts three months. A PSP-type submittal prior to each Stage II event may be a more appropriate controlling document.
- 8) Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
 Section #: 6.3.2 Pg #: 6-5 Line #: 9 Code: C
 Comment: The text should state that the streamlined confirmation will be used for 36 FRL constituents and reference the table proposed in the above comment (Section 4.4.2, Page 4-11, Line 6).
- 9) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 6.4.1 Pg #: 6-6 Line #: 1st sentence Code: c
 Comment: The text reads, "No monitoring result collected at a monitoring location may exceed the groundwater FRL." This statement is not precise. Our suggested alternate phrasing ("If during Stage III any monitoring well sample exceeds the FRL, then the module will default to Stage I.") is practically identical to the text of the third sentence. We suggest re-writing the entire paragraph so that the intended meaning is the same but avoiding the phrase "no monitoring location may exceed the groundwater FRL."
- 10) Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
 Section #: 7.2 Pg #: 7-1 Line #: 12 Code: C
 Comment: It is agreed that three monitoring wells will likely be sufficient for transition monitoring. To increase flexibility with respect to setting up the transition monitoring network for a module, however, the text should be revised to allow the specification of more than three monitoring wells upgradient of a clean module. The text should, therefore, be revised to read "A minimum of three monitoring wells will be selected...."

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- 11) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 8.2 Pg #: 8-1 Line #: 1st sentence Code: c
 Comment: The text states, "Following completion of the entire remedy, all extraction and monitoring wells will be plugged and abandoned in a manner that is protective of the environment." This statement is not adequate. Reference should be made to current Fernald standard operating procedures currently in place and also provide the proper citation to Ohio Department of Natural Resource regulations which govern the closing and abandonment of wells. It should be explicitly stated that P&A will comply with these regulations as they evolve over the coming years.
- 12) Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
 Section #: 9.1 Pg #: 9-1 Line #: 4 Code: C
 Comment: Long term water level monitoring should be conducted in the source areas themselves rather than using water levels measured at the OSDF as a remote indicator of source area water levels. Although a close correlation between OSDF and source area water levels may exist now, future offsite stresses in the aquifer may have a differential affect at the OSDF relative to the source areas, thus obscuring the currently observed correlation.
- 13) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 9.2 Pg #: 9-1 Line #: 2nd paragraph & Figure 9-3 Code: c
 Comment: The text describes that former suspected source areas would be investigated if the water table rises above a described range. Figure 9-3 shows the former source areas. We agree that the source area under Clearwell and the Pilot Plant Drainage Ditch are properly located. The target sampling areas in the South Field do not appear to correlate with either of the two fly ash storage piles or the northern branches of the Storm Sewer Outfall Ditch. Furthermore, the footprint of the original Plant 6 Plume is not designated as a target sampling area. Provide justification for the chosen locations in the south field and for the omission of the Plant 6 area.
- 14) Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
 Section #: Appendix B Pg #: B-9 Line #: 5 Code: C
 Comment: The UTL value computed using the mean and standard deviations of the logarithms of the concentrations must be compared to logarithm of the FRL. Alternatively, the mean and standard deviation of the untransformed data should be corrected for bias before exponentiation of the UTL.