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February 08, 2006

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

RE: COMMENTS - TRANSMITTAL OF THE INTEGRATED ENVIRONMENTAL MONITORING PLAN MID-YEAR DATA SUMMARY FOR 2005

Dear Mr. Reising:

Ohio EPA has reviewed the Transmittal of the Integrated Environmental Monitoring Plan Mid-Year Data Summary for 2005 Rev.0 Final (51350-RP-0027) submitted on November 28, 2005. Ohio EPA's comments are enclosed.

If there are any questions, please contact me at (937) 285-6466 or Donna Bohannon at (937) 285-6543.

Sincerely,

Donna Bohannon for

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

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

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IEMP MID-YEAR DATA SUMMARY FOR 2005

Comments:

1. Commenting Organization: Ohio EPA Commentor: DHWM
Section #: 2.2 Pg #: 2-3 Line #: 1st complete paragraph Code: C
Comment: The text discusses the uranium concentration in the GMA in the Former Production Area in the vicinity of the location of the former Plant 6. The text states that the total uranium concentrations in Monitoring Well 2389 are currently above the FRL after having been below the FRL for almost 10 years. Two comments;

1) The text states that the increase in the total uranium concentration does not appear to be correlated with high water levels. Are we correct in inferring that the water table is currently low and the lack of correlation is partly because there is no recent data from high water table conditions?
2) Please delete the last sentence which states, "At this time, uranium concentrations do not indicate the need to install an extraction well in this area." To the contrary, uranium concentrations do argue for locating an extraction well here. Geopunches performed in the year 2004 limit the areal extent of the contamination and argued against the existence of a large plume in this area. We also agree that the aquifer should be further monitored in this area.

2. Commenting Organization: Ohio EPA Commentor: DHWM
Section #: Pg #: Line #: Table 2-3 Code: C
Comment: This table provides the South Plume Module operational summary sheet. We note that RW-4 has very low uranium concentration and subsequently a low uranium mass removal index. We also note that RW-4 was pumped at a rate 313 g.p.m. as average over six months. This is higher than the target rate and much higher than any other well in the South Plume. In a more perfect world, it would be preferable to pump the more highly contaminated well at a higher rate than the less contaminated wells. Discuss in more detail the operational considerations which resulted in increased pumping in RW-4 instead of RW-1 (or RW-2). We note that several mechanical problems prevented an increase in the pumping rate of RW-3, the most contaminated well in the South Plume.

year should be explained as well as the assumed pump head for the extraction well and the electrical unit cost.