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May 19, 2006

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

RE: COMMENTS ON RTC TO THE GROUNDWATER CERTIFICATION PLAN

Dear Mr. Reising:

This letter provides Ohio Environmental Protection Agency comments on the responses to Ohio EPA comments on the Groundwater Certification Plan.

If you have any questions please contact Tom Ontko or me.

Sincerely,

Tom Ontko

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.

Ohio Environmental Protection Agency Comments on the RTC to the Groundwater Certification Plan

1) Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
Section #: 4.2.2 Pg #: 4-3 Line #: 6 Code: C
Original Comment# 4
Response: DOE's proposed text edit states "Supplemental pumping will continue until the existing wells, pumps, or motors being used are no longer serviceable." In order to accurately ascertain the impact of the re-injection, some minimum number of concentration measurements from the site monitoring wells in the vicinity of the SSOD are needed. This text should, therefore, be revised to read "Supplemental pumping will continue until sufficient monitoring data have been collected to assess whether or not SSOD re-injection improves remedy performance."

Commenting Organization: Ohio EPA Commenter: GeoTrans, Inc.
Section #: 9.1 Pg #: 9-1 Line #: 4 Code: C
Original Comment# 12
Response: The key objective of the long term water level monitoring is to ascertain whether high water levels exist in the source areas. Elevated water levels may result in concentration rebound by the release of sorbed contaminants in the unsaturated zone. Based on available site data, rebounding concentrations are a very real possibility. Accurate assessment of source area water levels is, therefore, critical and should not be based on remote measurements. As noted in the original comment, unforeseen changes to water levels are possible, particularly given the long period of time involved in this monitoring task. Although the proposed long term monitoring approach using the OSDF wells is clearly more convenient with respect to implementation, the potential for a false negative (the conclusion that source area water levels are low when the opposite is true) is clear. The source area water level monitoring should be conducted at the source areas.