



Department of Energy
Office of Legacy Management

December 19, 2007

Mr. Tim Fischer, Remedial Project Manager
United States Environmental Protection Agency
Region V-SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Mr. Thomas Schneider, Project Manager
Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402-2911

Dear Mr. Fischer and Mr. Schneider:

Subject: **Transmittal of Responses to Ohio Environmental Protection Agency and United States Environmental Protection Agency Comments on the 2006 Site Environmental Report**

- Reference: 1) Letter, T. Fischer to J. Powell, "Re: Comments - 2006 Fernald Site Environmental Report," dated November 1, 2007
- 2) Letter, T. Schneider to J. Powell, "Re: Comments - 2006 Fernald Site Environmental Report," dated October 19, 2007

Enclosed for your review and approval are responses to EPA comments on the 2006 Site Environmental Report (Reference 1) and OEPA comments on the 2006 Fernald Site Environmental Report (Reference 2).

If you have any questions or require any additional information, please call me at (513) 648-3148.

Sincerely,

Jane Powell,
Fernald Site Manager
DOE-LM-20.1

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REPLY TO: Harrison Office

Mr. Tim Fischer
Mr. Thomas Schneider
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Enclosures

cc w/ enclosure:

M. Cullerton, Tetra Tech.
M. Murphy, USEPA-V, A-18J
T. Schneider, OEPA (three copies of enclosure)
M. Shupe, HSI GeoTrans
Project Record File FER 115.10.02(A) (thru W. Sumner)
Administrative Records (thru W. Sumner)

cc w/o enclosure:

K. Broberg, Stoller
B. Hertel, Stoller
F. Johnston, Stoller
G. Lupton, Stoller
T. Pauling, DOE-LM20.1 (e)
C. White, Stoller

**RESPONSES TO UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY COMMENTS ON THE
2006 SITE ENVIRONMENTAL REPORT**

**FERNALD PRESERVE
FERNALD, OHIO**

DECEMBER 2007

U.S. DEPARTMENT OF ENERGY

**RESPONSES TO UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE 2006 SITE ENVIRONMENTAL REPORT
DECEMBER 2007**

FERNALD PRESERVE

GENERAL COMMENT

Commenting Organization: U.S. EPA

Commenter: Fischer

Section #: Not Applicable (NA)

Page #: NA

Line #: NA

Original General Comment #: 1

Comment: The document should be revised to include information about surface water issues existing in Waste Pit 3 swale area.

Response: DOE had collected only two samples in this swale area, in late December 2006, with results above the surface water FRL. However, due to the evolving nature of this issue, including establishing consistent sampling points, the formal sampling program in this area did not begin until January 2007. The water in question was not in a drainage channel or basin that could potentially flow leading to an off-site impact. The data collected were directed more at understanding the soil characteristics of the area rather than quantifying or describing a potential impact to surface water. The regulators and key stakeholders have been kept apprised of this situation from the initial discovery through the eventual resolution.

Action: DOE will discuss the entire issue, including data, leachability study results, and the approved and completed maintenance activity in the 2007 Site Environmental Report (SER).

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commenter: Fischer

Section #: 3.3.1.6

Page #: 3-20

Line #: NA

Original Specific Comment #: 1

Comment: Figure 3-10 on this page is missing a north arrow. Figure 3-10 should be revised to include a north arrow.

Response: This comment seems to be addressing Figure 3-10 (Non-Uranium Constituents With 2005 Results Above Final Remediation Levels) from the 2005 SER. Figure 3-9 (Non-Uranium Constituents With 2006 Results Above Final Remediation Levels) in the 2006 SER is missing the north arrow. The north arrow will be added to the figure in future editions of the SER.

Action: The north arrow will be added to the figure in future editions of the SER.

Commenting Organization: U.S. EPA

Commenter: Fischer

Section #: 5.6

Page #: 5-18

Line #: NA

Original Specific Comment #: 2

Comment: Figure 5-10 on this page includes two hatched areas in the northeast and southeast corners of the figure. Other figures in the report indicate that these two areas are bedrock highs. The legend in Figure 5-10 should be revised to indicate that the hatched areas are bedrock highs.

Response: This comment seems to be addressing Figure 5-10 (NESHAP Stack Emission Monitoring Locations) from the 2005 SER. Figure 5-10 does not exist in the 2006 SER.

Action: None

**RESPONSES TO OHIO ENVIRONMENTAL
PROTECTION AGENCY COMMENTS ON THE
2006 SITE ENVIRONMENTAL REPORT**

**FERNALD PRESERVE
FERNALD, OHIO**

DECEMBER 2007

U.S. DEPARTMENT OF ENERGY

3. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Page #: Line #: Code: E
Comment: When referencing a figure within the document also include the page number on which the figure can be found.

Response: Comment acknowledged.

Action: None

Specific Comments:

4. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Exec. Summary Page #: xvi Line #: na Code: C
Comment: The last paragraph on this page "Estimated Dose for 2006" is confusing. The sentence, "The contributions from this all-pathway dose for 2006 was 0.17 from air inhalation and 2.8 mrem from direct radiation," is inconsistent with the earlier statement that the maximally exposed individual received a maximum dose of 2.8 mrem. $2.8 + 0.17 = 2.97$ or approximately 3 mrem. Please change the sentence to reflect that the 0.17 mrem from air inhalation was from a different location than the maximally exposed individual for direct radiation.

Response: The all-pathway dose is measured at AMS-8. The air inhalation dose cited (i.e. 0.17 mrem) was based on emissions measured at AMS-3. The air inhalation dose at AMS-8 was 0.037 mrem as shown in Table 6-1 Dose to Maximally Exposed Individual. The sum of the contributions is then 2.8 mrem (2.8 mrem + 0.037 mrem).

Action: Care will be taken to ensure that information contained in the Executive Summary reflects the information contained in each individual section.

5. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Exec. Summary Page #: xvii Line #: na Code: C
Comment: Another bullet should be added to the Natural Resources section to reflect the challenges associated with trash, debris (contaminated and otherwise), and invasive plant species.

Response: See response to Comment No. 2 above.

Action: See Action for Comment No. 2 above.

6. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.2 Page #: 1-8 Line #: third bullet Code: C
Comment: This paragraph (third bullet) should provide a sentence in regards to where the IEMP is housed, especially so anyone from the public wanting to look up information in the IEMP will know that it is contained in the LMICP. Include this information in the SER.

Response: Agreed.

Action: The 2007 SER will identify that the Integrated Environmental Monitoring Plan is now Attachment D of the Comprehensive Legacy Management and Institutional Controls Plan.

7. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.1 & 2.1.2 Page #: 2-2 & 2-9 Line #: Code: C
Comment: References made to the statements regarding the IRA Rpt for OU5 and the soil certification reports submittal dates, will need to be revised in the next revision of the SER.

Response: Comment acknowledged.

Action: The references made to the Interim Remedial Action Report for Operable Unit 5 submittal date and the final soil certification report approval date will be updated in the 2007 SER.

8. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.1.2 Page #: 2-7 Line #: Figure 2-1 Code: C
Comment: Figure 2-1 is incorrectly presented. Even at the end of 2006, there were numerous areas that were still uncertified at Fernald and this figure does not reflect that fact. Revise this figure to show all uncertified areas at the end of 2006 and include the date and time the figure demonstrates. In addition, the text on following page is correct in describing Figure 2-1 (page 2-8, third paragraph, and first sentence).

Response: At the end of 2006, all soil certification data collected indicated all remediation areas (except those identified in Figure 2-1) met the soil final remediation levels. The text on page 2-8 provides a complete status of the soil certification reports. DOE believes the status of the certified areas has been adequately captured in this section.

Action: None

9. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.2.1 Page #: 2-15 Line #: na Code: E
Comment: The punctuation for OAC is incorrect. Correct in future editions of the SER.

Response: Agreed.

Action: References to the Ohio Administrative Code will be punctuated correctly in the future.

10. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Table 2-2 Page #: 2-20 Line #: na Code: C
Comment: The section of the table under, "Natural Resource Requirements Under CERCLA and Executive Order 12580," "2006 Compliance Activities" is incomplete and does not accurately reflect the status of Natural Resource Requirements.

Response: Acknowledged.

Action: Table 2-2 will be revised as warranted in 2007 SER.

11. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.1.4 Page #: 2-12 Line #: Code: E
Comment: Please include the complete name for the acronym WCS.

Response: The acronym for Waste Control Specialists is contained in the Acronym list on Page vii. It is also spelled out in the Executive summary.

Action: None

12. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.3 Page #: 2-22 Line #: first paragraph, last sent Code: C
Comment: The last sentence in the first paragraph needs to be removed. Ohio EPA has not written an Annual Report for several years.

Response: Comment acknowledged.

Action: References to an OEPA annual report on Fernald will be removed from future SERs.

13. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.3.1.5 Page #: 3-17 Line #: na Code: E
Comment: The second to last sentence on this page has misspelled "map" as "man", correct in future editions of the SER.

Response: Agreed

Action: This sentence will be corrected in the 2007 SER.

14. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.3.1.5 Page #: 3-18 Line #: na Code: C
Comment: The paragraph dedicated to "South Field and South Plume Areas" is confusing. Earlier in this section the SER reports that treatment caused a decrease in the uranium plume by approximately 7 acres. This section implies that the sampling allowed for better mapping of the plume, which reduced its size by 7 acres. Was it treatment, better mapping, or a combination of both?

Response: The uranium concentration data indicates that the footprint of the 30 ug/L maximum uranium plume in 2006 is approximately 7 acres smaller than it was in 2005. This reduction is attributed to continued pump and treatment operations.

Action: No action required.

15. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.3.1 Page #: 4-9 Line #: Code: C
Comment: STRM 4004 at Paddys Run is below the level of glacial overburden and in contact with the aquifer. This should be included in cross media impacts.

Response: STRM 4004 has not been historically considered a cross-medium impact location. The reason for this is because any potential for cross media impact from the minor drainage passing through the STRM 4004 location is monitored at SWP-03 and South Field Area monitoring wells.

Action: None

16. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.1 Page #: 5-2 Line #: na Code: C
Comment: Add a bullet to the list of primary emission sources that were active in 2006:

- The D&D of remediation facilities

Response: Comment acknowledged. As with past SERs, no revisions will be made to published reports rather those corrections are made in subsequent reports. In this case this comment is applicable to this specific report (i.e. D&D of remediation facilities is complete and will have no impact on future SERs).

Action: None

17. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.3 Page #: 5-3 Line #: na Code: E
Comment: The first bullet incorrectly states that NESHAP Subpart H includes radon. Correct wording to indicate that radon is NOT included in the 10 mrem EDE for air emissions.

Response: Agreed. The word "not" was inadvertently excluded from the text.

Action: In future SERs references to NESHAP Subpart H will correctly state that radionuclide emissions to the ambient air from DOE facilities do not include radon.

18. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.3 Page #: 5-8 Line #: na Code: C
Comment: The statement that, "The nine percent increase in the thorium isotopes emission relative to 2005 is an artifact of lower thorium background..." and also stated again in the last paragraph of the section is misleading and is not supported by the data presented in this report. Background should be present at approximately equal concentrations fence-line and at the background location. After subtracting the background from the fence-line locations, the net emissions are calculated. The concentration present at background should not effect the emissions calculated at fence-line, unless the background site had been influenced by other factors.

Response: The analysis presented in the text is correct, but clarification and explicit citation to figures and tables in Chapter 6, Appendix C and Appendix D will be provided to the reader in future SERs. AMS-12 is the only background location available for correcting the fence-line monitor results, and this correction has been performed in the same manner in the approved 2005 SER. Therefore, when thorium background at AMS-12 decreased in 2006, relative to 2005 (Tables C.1-4, C.1-5 and C.1-6), the corrected results for the fence-line monitors show thorium dose to be a slightly higher percentage of the total dose (total dose being uranium isotopes plus thorium isotopes plus radium isotopes). The thorium concentration present at AMS-12 does not affect the emissions measured at the fence line. However, it is clear that the net emissions are dependent on background concentration, because background is subtracted from the fence-line emissions to derive the net emission used in the dose calculations (Chapter 6 and Appendix D).

Action: In the 2007 SER, the last two sentences of the first paragraph on p. 5-8 will be replaced with: "In 2005, thorium contributed about 48 percent of the total dose to the receptor, and in 2006 thorium was 57 percent of the total dose (nine percent increase). This increase is due to lower thorium activity in 2006, as measured on particulate collected at background monitor AMS-12 (Tables C.1-4, C.1-5 and C.1-6). It is unclear why thorium activity decreased at AMS-12 in 2006, as uranium and particulate results at AMS-12 are similar in 2005 and 2006 (tables

22. Commenting Organization: OEPA

Commenter: GeoTrans, Inc.

Section #: Attach. A.2

Page #: A.2-3 Line #: 24

Code: C

Comment: The footnotes in Table A.2-2 should be revised to summarize the statistical distinction between the terms "marginal" and "significant" in the trend results column.

Response: The Mann-Kendall test evaluates trends in the data by examining time-ordered data pairs then assigning a value of -1, 0, or 1 for decreases in concentrations, no change in concentrations, or increases in concentrations, respectively. The assigned values are summed for all time pairs to determine if any trend is present in the data and if so, whether the trend is up or down.

The significance of the up or down trend is evaluated by considering the probability of such an arrangement of data points occurring by random chance. A probability of 0.05 or less than the time-ordered data pairs could have occurred by chance is designated as a significant trend (up or down). A probability greater than 0.05 but less than or equal to 0.10 is designated as a marginal trend. A data set with a probability greater than 0.10 is designated as showing no trend.

Action: For future SERs a footnote "h" will be added to the "Trend" column stating the following:

A probability of 0.05 or less that the time-ordered could have occurred by chance is designated as a significant trend (up or down). A probability greater than 0.05 but less than or equal to 0.10 is designated as a marginal trend. A data set with a probability greater than 0.10 is designated as showing no trend.

23. Commenting Organization: OEPA

Commenter: GeoTrans, Inc.

Section #: Attach. A.2

Page #: A.2-3 Line #: 27

Code: C

Comment: In order to more completely depict site wide trends in total uranium concentrations, Figure A.2-4 should be revised to include the up-marginal and down-marginal wells. To avoid defining additional symbols on the map, these wells could possibly be included with the no significant trend points. Alternatively, they could be included as up- or down- significant points as appropriate.

Response: DOE appreciates this suggestion, and would welcome any future suggestions concerning the improvement of data presentation in the annual SER. In this case though, DOE would like OEPA to reconsider. Figure A.2-4 currently displays enough data to communicate aquifer remedy response trends (up significant, down significant, and no change). It complies with the objective of reducing the amount of data prior to presentation by focusing on what is important. Adding the requested data to the figure would clutter the figure and make it harder to visualize trends.

Action: No action required.

24. Commenting Organization: OEPA

Commenter: GeoTrans, Inc.

Section #: Attach. A.2

Page #: A.2-4 Line #: 24

Code: C

Comment: Well 83341 appears to be mislabeled on Figure A.2-3A.

Response: Figure A.2-3A – Direct-Push Data and Maximum Total Uranium Plume Through the Second Half of 2006 – contains Geoprobe locations only. Therefore well 83341 should not be included in the figure. Well 83341 is correctly labeled on Figure A.2-3B – Monitoring Well Data and Maximum Total Uranium Plume Through the Second Half of 2006.

Action: None

25. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: Attach. A.2 Page #: A.2-5 Line #: 22 Code: C
Comment: DOE suspects that biofouling conditions exist at Well 2010 and that biofouling has caused the observed elevated manganese concentrations. The sampling needed to confirm this suspicion has never been conducted. The text should note that manganese was historically used as a process chemical at the site.

Response: In the Waste Storage Area Phase II Design DOE acknowledged that the presence of the manganese plume beneath the Waste Storage Area could be attributed to wet chemical operations that took place in Plant 8, when the plant was operating. Manganese was used in Plant 8 in a process that recovered UF4. DOE agrees that it would be a good idea to restate this in future SERs.

In response to Original Comment #1 on the 2005 SER, DOE stated that; "Groundwater samples obtained in 2005 from direct push locations next to Monitoring Wells 2010 and 2648 confirm that manganese concentrations measured in Monitoring Wells 2010 and 2648 are considerably higher than manganese concentrations measured in direct push samples collected near the monitoring wells. Monitoring for manganese will continue in the Waste Storage Area and additional testing will be considered (including microbiological testing) should manganese concentrations in the area not respond to the remedy as predicted."

Action: In future SERs, DOE will restate that manganese was historically used at the site, and that additional confirmation sampling for manganese may be conducted if the manganese concentrations in the area do not respond to the remedy as predicted.

26. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: Attach. A.2 Page #: A.2-5 Line #: 27 Code: C
Comment: The text should include an explanation of why biofouling in the well would impact the unfiltered total uranium concentration.

Response: Biofouling is commonly associated with a large concentration of particulate matter. Filtering the groundwater sample removes the particulates that are larger than the pore size of the filter being used. If the particulates in the sample were not removed prior to analysis, metals sorbed to the surface of the particulates could react to the acid preservative and digest into the sample raising the resulting dissolved concentration measured in the water sample.

Action: No action required.

27. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: Attach. A.2 Page #: A.2-7 Line #: 1 Code: C
Comment: As stated in DOE's response to Ohio EPA Original Comment #3 on the 2005 Site Environmental Report, an objective of direct push sampling in 2006 would be the delineation of the southern extent of the elevated total uranium concentration observed at Geoprobe 12196a in 2005. Please provide the results from this sampling or indicate when it will (or has) occurred.

Response: The subject geoprobe sampling took place in February of 2007 at Location 13357. The attached map indicates the location of 13357 in relation to 12196a. Uranium results are provided below. As the results indicate, the southern extent of the elevated uranium

concentrations observed at Geoprobe 12196a in 2005 has been determined. These results will be formally reported in the 2007 SER.

Geoprobe Location 13357

Sample Point	Elevation (ft amsl)	Depth (ft bgs)	Sample Interval	Uranium Conc. (5 micron filtered) (ug/L)
1	513.22	68	0 feet - 10 feet	< 1.0
2	503.22	78	10 feet - 20 feet	26.6
3	503.22	78	10 feet - 20 feet	27.9
4	493.22	88	20-feet - 30 feet	17.8
5	483.22	98	30 feet - 40 feet	< 1.0
6	473.22	108	40 feet - 50 feet	1.1
7	463.22	118	50 feet - 60 feet	1.1
Rinsate				< 1.0

Action: No action required.

28. Commenting Organization: OEPA

Commenter: GeoTrans, Inc.

Section #: Attach. A.2

Page #: A.2-8 Line #: 2

Code: C

Comment: A potentially complicating factor in the evaluation of recent Geoprobe sampling results at Direct-Push Location 12373L is that, although the samples were collected at the same location horizontally, they were collected at different positions relative to the water table. The 2005 sample was apparently collected at the water table surface (515.3 feet – the text does not indicate the water table elevation at this time but states that the top of the plume is at this level). The 2006 sample, however, was collected 4.5 feet below the water table. A comparability issue, therefore, may exist regarding the text discussion since at many locations at the site, the highest concentrations are at the water table, regardless of season.

Response: Comment acknowledged. Sampling procedure is to collect the first water sample one foot beneath the water table. In 2006 this was not possible, and the first sample ended up being collected approximately 4.8 feet beneath the water table. Sometimes the sampler encounters fine grain material that will not readily yield water to the mill slots of the sampler. When this happens the sampling tool is pushed a little deeper in order to clear the fine grain material. This coupled with the fact that the regional water table was low when sampling took place in 2006 lead to the decision to take a conservative approach and not re-define the maximum uranium plume at this location for the 2006 SER.

Action: No action required.

Attachment A.3

29. Commenting Organization: OEPA

Commenter: GeoTrans, Inc.

Section #: Attach. A.3 Page #: A.3-1 Line #: 1

Code: C

Original Comment#

Comment: As an apparent result of document reproduction and the small type face used, large portions of Figures A.3-1 through A.3-4 are illegible. A separate contour line type should be used for groundwater level contours as opposed to the 30 ug/L total uranium isopleth.

Response: Comment acknowledged.

Action: Efforts will be made to ensure that figures are more legible in future SERs.

Attachment A.4

30. Commenting Organization: OEPA

Commenter: GeoTrans, Inc.

Section #: Attach. A.4 Page #: A.4-6 Line #: 24

Code: C

Comment: The text notes that the manganese exceedance for Monitoring Well 22210 was persistent in 2005 but was determined to be not persistent in 2006. Manganese also exceeded in 2005 for nearby well 22205 and the manganese exceedance in adjacent well 22204 was declared persistent in 2006 for the first time. The "continued monitoring" response to these observances is inappropriate given that monitoring has already shown that a pattern of manganese exceedance exists along this approximately 1000 foot segment of the eastern property boundary where the three wells are located. DOE should investigate whether or not the observed manganese exceedances are possibly related to a localized plume since manganese was used as a process chemical at the site. In addition, the exceedances may be related to the manganese plume located up gradient in the Waste Storage Area. The eastern extent of this plume was bounded by only one Geoprobe sampling point.

Response: Manganese data in the SSOD area does not indicate the presence of a manganese plume that needs to be addressed through the groundwater remedy. Monitoring Well 22204 is the only well that has a history of persistent manganese exceedances (see Table A.4-2, 2006 SER). It is more probable that the elevated manganese at Monitoring Well 22204 is due to biofouling of the well than it is that a manganese plume of any size is present.

With the exception of Monitoring Well 2426 and Monitoring Well 22204, manganese exceedances in the SSOD area have been sporadic. Monitoring Well 2426 had seven manganese exceedances between 1997 and 2004 (Table A.4-2, 2004 SER). Monitoring well 2426 was plugged and abandoned August 2, 2005, and was replaced by Monitoring Well 22210. A manganese exceedance was detected at Monitoring Well 22210 in the first half of 2005, but no exceedance has been detected since. From the data collected to date, it looks as if the manganese exceedances in the area of Monitoring Well 2426 disappeared with the installation of the replacement well. The assumption is that Monitoring Well 2426 was biofouled, and the replacement well is not. Monitoring for manganese at Monitoring Well 22210 will continue.

DOE understands that OEPA would like to see some additional direct-push sampling to verify that the eastern extent of the manganese plume in the waste storage area has been properly located. The eastern extent of the manganese plume in the waste storage area is currently bounded with data from Monitoring Wells 2037 and 2008, and direct push locations 13329,

36. Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: B.1.1.1 Page #: B.1-4 Line #:

Code: C

Comment: The last paragraph indicates an FRL exceedence but does not state for what constituent. One must refer to Table B.1-1 to see that it is copper that exceeded the FRL. Please include the constituents with the exceedences.

Response: The text states that "Table B.1-1 lists the surface water FRL exceedences at corresponding sample locations..." Table B.1-1 identifies a FRL exceedence for copper at SWD-03.

Action: None

37. Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: B.1-7 Page #: B.1-11 Line #: Code: C

Comment: The latest entry in this figure (mid-2006) shows a value near 200, four times the next highest value in the previous eight years. There is no explanation for the cause of this nor why there are no follow up samples. Per the IEMP, OEPA is to be informed of unusual results/trends and had not been informed of this result. This is particularly important in the current period of reduced oversight. Additionally, this drains into Paddys Run in an area in contact with the aquifer and should be considered under cross media impacts.

Response: There appears to be a difference of opinion over significance. OEPA was not informed of the result as it was not above the surface water FRL and the location is not a cross-medium impact location (see response to Comment 15). No trend had been established based on this one sample result. The result appears to be an isolated incident.

Action: DOE believes that once GEMS is fully functional, should OEPA identify sample results of concern, then a discussion could take place between OEPA and DOE.