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November 26, 2008

Ms Jane Powell, Fernald Site Mgr
DOE-LM-20.1
10995 Hamilton Cleves Hwy
Harrison, Ohio 45030

**RE: COMMENTS - 2009 COMPREHENSIVE LEGACY MANAGEMENT AND
INSTITUTIONAL CONTROLS PLAN, REVISION 3 DRAFT FINAL**

Ms Powell,

Ohio EPA has received DOE's "Transmittal of the 2009 Comprehensive Legacy Management and Institutional Controls Plan, Revision 3 Draft Final" on October 1, 2008. Ohio EPA has reviewed the report and our comments are enclosed.

If there are any questions, please contact me.

Sincerely,

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

Cc: Tim Fischer, US EPA
Michelle Cullerton, Tetra Tech
Frank Johnston, Stoller

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**OHIO EPA COMMENTS ON THE 2009
COMPREHENSIVE LEGACY MANAGEMENT AND
INSTITUTIONAL CONTROLS PLAN, REV 3 DRAFT FINAL**

General Comments:

1. Commenting Organization: Ohio EPA

Section: General Pg#: Line#: Code: C

Comment: The 2009 LMIC had many changes throughout the document and most of them were not listed on the Significant Changes Summary sheets. Due to these changes not being provided on the list, it was difficult to figure out why the changes were made and to understand the remaining text. In addition, the text that had been stricken from the document was not all handled the same. Some red text was completely removed and changed, some was moved to a different location in the document and some changes were written in black and/or blue. For future LMICs, it would be beneficial to Ohio EPA to include all changes on the summary sheet and make it clear as to why the change was incorporated.

2. Commenting Organization: Ohio EPA

Section: General Pg#: Line#: Code: C

Comment: Ohio EPA agrees, in part, with DOE changing the OSDF inspection schedule. Wading through thick vegetation through which the cell cap cannot be observed reduces the effectiveness of the cap walkover. We are also in agreement, in part, with DOE's proposal regarding the semi-annual walk downs. However, continued quarterly inspections, on certain sections of the OSDF should remain as part of the monitoring process. Quarterly inspections should include walking the toe of the OSDF and visually inspecting all cells from the toe, checking the OSDF perimeter for invasive and woody vegetation, examining institutional controls, and walking the Cell 7/8 transition area. In addition, Cells 1, 7, & 8 should continue to be monitored in their entirety on a quarterly basis for the next year. Cell cap 1 is struggling to re-vegetate. Cells 7 & 8 are not fully established and still have construction issues to monitor. Therefore, a total of four inspections each year would be conducted where two would include the complete walk down of all the cells.

Lastly, and most importantly, walk-over inspections on mowed or burned cells must be conducted within two weeks after the maintenance operation. Prior Ohio EPA notification of the mow or burn would allow sufficient time to coordinate inspection staff.

The entire document makes many references in text and tables to DOE's proposed OSDF inspection changes. Please use this general comment to appropriately change the document in all instances.

Comments:

Volume I

3. Commenting Organization: Ohio EPA

Section #: 1.2 Pg #: 1-6 Line #: 26-28 Code: E

Comment: The first sentence of this paragraph does not make sense and needs to be re-written.

4. Commenting Organization: Ohio EPA

Section #: 2.3.1 Pg #: 2-5 Line #: 8 Code: C

Comment: In this section and throughout the entire CLMICP, remove the phrase, "removed all impacted material". This is simply not true. Use a phrase that indicates soils detected above FRLs have been removed.

5. Commenting Organization: Ohio EPA

Section #: 2.4 Pg #: 2-6 Line #: 9-11 Code: E

Comment: Reword the introductory paragraph. It should be an introduction to the sections that follow.

6. Commenting Organization: Ohio EPA

Section #: 2.4.5 Pg #: 2-10 Line #: 31-43 Code: C

Comment: Make the first two paragraphs of this section match. For example, the former Silos Warehouse should immediately be identified as the Visitors Center in the first paragraph.

7. Commenting Organization: Ohio EPA

Section #: Figure 2-4 Pg #: 2-13 Line #: an Code: C

Comment: The map in this figure does not include the former Communications Building that is referenced in Section 2.4.5. Add the former Communications Building to the map.

8. Commenting Organization: Ohio EPA

Section #: 5.4 Pg #: 5-2 Line #: 33 Code: C

Comment: The website listed http://www.lm.doe.gov/CERCLA/cercla_ar.htm is not a direct link to the Administrative Record. The web user is redirected to <http://www.lm.doe.gov/CERCLA/SiteSelector.aspx>.

Volume II

9. Commenting Organization: Ohio EPA

Section: 2.1.3.3 Pg#: 2-7 Line#: 25-30 Code: C

Comment: The text describing the "pin flag" process does not follow through with the end result, after flagging an item. As the statement reads, the reviewer doesn't know what happens to the item once it is flagged and logged. Please clarify the text or reference the section of the document where this is discussed. In addition, the ability of personnel to be able to relocate some of the pin flags at a later date has proven difficult and impossible at times. Ohio EPA recommends the use of "smart cameras". These cameras not only provide a picture record of the finding, but also tag the photographers location with GPS coordinates

10. Commenting Organization: Ohio EPA

Section: 3.1.1 Pg#: 3-1 Line#: 26-28 Code: C

Comment: The text states, "Fernald Preserve inspections are now conducted annually." Add the following text for clarification, "Specific quadrants are inspected quarterly so the entire site has been inspected during the year".

Fernald Preserve staff will continue making 'point specific' quarterly inspections of institutional controls, such as access points, signage and fencing. This needs to be clearly and thoroughly described in the text and Table 3-1 of the LMICP.

11. Commenting Organization: Ohio EPA
Section: 3.2 Pg#: 3-5 Line#: Table 3-2 Code: C
Comment: Add a row to Table 3-2 to describe the inspection process after the cell cap has been mowed.

12. Commenting Organization: Ohio EPA
Section #: 3.2.1 Pg #: 3-9 Line #: 1-4 Code: E
Comment: There are text redundancies at the bottom of page 3-8 and top of page 3-9.

13. Commenting Organization: Ohio EPA
Section #: 4.2 Pg #: 4-2 Line #: 19-23 Code: C
Comment: This paragraph is insufficient in the description of handling contaminated soil and/or debris. There must be time limits and pre-selected areas to be established for the stockpiling of contaminated materials.

14. Commenting Organization: Ohio EPA
Section: 5.2.3 Pg#: 5-5 Line#: Code: E
Comment: Information from this section appears to be missing. Please clarify.

Volume II - Appendix D

15. Commenting Organization: Ohio EPA
Section: OSDF & Fernald Preserve Inspection Forms Pg#: Line#: NA Code: E
Comment: The OSDF Forms for the Cell Cap Post Closure Inspection Checklist appear to be left out of this section.

16. Commenting Organization: Ohio EPA
Section: OSDF & Fernald Preserve Inspection Forms Pg#: Line#: NA Code: E
Comment: The "Maintenance and Repair Action Items" form should be included in this section.

17. Commenting Organization: Ohio EPA
Section: OSDF & Fernald Preserve Inspection Forms Pg#: Line#: NA Code: E
Comment: Add columns for "date" and "inspector initials" since many of the IC quarterly inspections happen separate from the main field inspections with the agencies. Also add a "GPS?" column.

Volume II – Attachment A

OMMP for Aquifer Restoration and Wastewater Treatment

18. Commenting Organization: OEPA
Section #: OMMP 3.4.4 Pg. #: 3.14 Line #: 26-27 Code: E
Comment: The statement, "untreated discharge prior to its being combining with other groundwater flows" should read, "untreated discharge prior to its being combined with other groundwater flows."

19. Commenting Organization: OEPA

Section #: OMMP 3.6.2 Pg. #: 3.16 Line #: 2-4 Code: C

Comment: The statement "The Fernald Preserve conducts a surface water sampling and analytical program for certain specific radionuclides that are potentially present in the regulated liquid effluent and in the uncontrolled storm water runoff from the site", should be modified to indicate that storm water is not excluded from regulation. Alternate wording would be "The Fernald Preserve conducts a sampling and analytical program for certain specific radionuclides that are potentially present in surface water and sediment from the site."

20. Commenting Organization: OEPA

Section #: OMMP 3.6.2 Pg. #: 3.16 Line #: 10 Code: C

Comment: The statement "while maintaining a monthly average of 30 ppb." should be revised to read "while not exceeding a monthly average of 30 ppb."

21. Commenting Organization: Ohio EPA

Section: 3.6.2 Pg#: 3-19 Line#: 1-10 Code: C

Comment: This entire section centers on the issue of Fernald Preserve's effluent discharging into the Great Miami River and how it must maintain compliance limits set out in the OU5 ROD. The regulatory requirements discussed in the first paragraph, on page 3-19 (red strike-out text), points out the background on how compliance was established. This information is important to understand the following paragraphs in this section and from a compliance aspect should be left in the text.

Volume II – Attachment B

Post Closure Care and Inspection Plan

22. Commenting Organization: Ohio EPA

Section #: 3.5 Pg #: 3-8 Line #: 8-31 Code: C

Comment: The PCCIP states that a number of site features should be documented with photographs every scheduled inspection. This has not been done consistently in the past. Each OSDF inspector should be equipped with a camera to document their findings at the time of inspection or an alternate procedure implemented to ensure photographs are collected.

Volume II – Attachment C

Groundwater/Leak Detection and Leachate Monitoring Plan, OSDF

23. Commenting Organization: OEPA

Section #: N/A Pg #: N/A Line #: N/A Code: C

Comment: Much of the key information provided by this plan is deeply embedded in text discussion in both the main document and in the appendices. As a result, the end user must wade through large quantities of text discussion to extract basic parameter data important to evaluating facility performance. An executive summary section should be added that summarizes key monitoring parameters and frequencies on a cell by cell basis. The executive summary should include a table similar to the one shown below.

Parameter Type	Parameter Description	Basis	Monitoring Frequency	Action Level	Action Level Units	Regulatory Status ¹
Flow Volume	LDS Flow Volume	Each Cell	Daily	20	gpad ²	Approved
	LCS Flow Volume	Each Cell	Daily	N/A	N/A	Approved
	LCS Containment Pipe Monitoring	Each Cell	Weekly	2270	mL	Approved
	LDS Containment Pipe Monitoring	Each Cell	Weekly	2650	mL	Approved
	RLCS Containment Pipe Monitoring	Each Cell	Weekly	2650	mL	Approved
	LTS in Each Valve House (PS-1 through 7)	Each Cell	Weekly	5300	mL	Approved
	LTS at Port V1007 (PS-9)		Weekly	18900	mL	Approved
	LTS at Port V1006 (PS-10)		Weekly	370	mL	Approved
Water Quality	LCS Analysis for Full List Appendix I and PCB	Each Cell	Annual	N/A	N/A	Approved
	LCS, LDS, HTW, GMA Aqueous Sample Analysis for Refined Parameter List ³	Each Cell	Quarterly	N/A	N/A	Approved

1. Regulatory status (regarding description, basis, frequency, & action level) as of time of plan submittal for EPA/Ohio EPA review (e.g., "proposed" or "approved").

2. gpad: gallons per acre per day

3. Refined monitoring list includes: Total Uranium, Boron, TOC, TOX, Sulfate, iron, manganese, sodium, lithium, arsenic, cobalt, selenium, zinc, TDS.

24. Commenting Organization: OEPA

Section #: 3 Pg #: 3-6 Line #: 40 Code: C

Comment: It is unclear what is meant by "further evaluation based on criteria identified in the Common Ion study." The text should be revised to note the specific criteria being referred to.

25. Commenting Organization: OEPA

Section #: 3 Pg #: 3-7 Line #: 35 Code: C

Comment: The text should be revised to indicate that the change to annual monitoring is a proposed change in this document. Prior to implementation, this change in monitoring frequency must first receive Ohio EPA approval.

26. Commenting Organization: OEPA

Section #: 4 Pg #: 4-10 Line #: 17 Code: C

Comment: Figures 4-4 and 4-5 should be revised to show the correct locations of the OSDF GMA monitoring wells.

27. Commenting Organization: OEPA

Section #: 4 Pg #: 4-13 Line #: 18 Code: C

Comment: The referenced text should be deleted. Consistent with the previous Common Ion Study report discussions, the x4 factor is too arbitrarily defined and, as a result, its use should be abandoned. Analytical accuracy and reproducibility is heavily dependent on the types of analyses run and other site-specific factors such as matrix interference. If DOE intends to propose the use a general screening parameter based on assumptions regarding the accuracy of chemical analyses, this parameter should be based on quality control data generated from site-specific sampling (e.g., analyses collected on Fernald site OSDF groundwater samples).

28. Commenting Organization: OEPA

Section #: 4 Pg #: 4-13 Line #: 23 Code: C

Comment: The referenced text should be revised. Fluid volume is obviously very important to consider. However, proper application of fluid volume data is in its use in the interpretation of the water quality data since regulatory standards are water quality-

based. Fluid volume data by itself does minimize the applicability of water quality data. Rather, it is the holistic interpretation of all data (both quantity and quality) that is meaningful.

29. Commenting Organization: OEPA

Section #: 4 Pg #: 4-14 Line #: 22 Code: E

Comment: The HMI acronym is not defined.

30. Commenting Organization: OEPA

Section #: 5 Pg #: 5-1 Line #: 30 Code: C

Comment: The referenced text states that the OAC requirement for annual leachate sampling and analysis for the OAC 3745-27-10 (Appendix I and PCBs) list "is fulfilled by sampling to the alternate parameter monitoring list (sic)." Apparently, this "fulfillment" is based on the discussion provided in Section 3.2.1.3 (amplified in Appendix E) which attempts to justify the exclusion from leachate monitoring of other potential parameters solely on the basis of a model-based analysis conducted to determine the OSDF WAC. The OSDF contains 2.96 million cubic yards of contaminated debris and soil. The analyses conducted to develop the WAC were necessary to achieve the goal that, to the extent possible, debris and soil with concentrations corresponding to risks above an acceptable threshold level were not disposed of onsite in the OSDF but were disposed of offsite in a facility designed to handle such materials. The WAC was the best available approach to achieve this goal. However, given the sheer volume of material placed in the OSDF, it is inappropriate to use the WAC calculations as justification a posteriori to exclude from leachate monitoring other parameters on the OAC 3745-27-10 (Appendix I and PCBs) list which may prove to be useful for leak detection monitoring purposes.

31. Commenting Organization: OEPA

Section #: 5 Pg #: 5-1 Line #: 30 Code: C

Comment: The referenced text should be deleted. Appendix I and PCBs should be analyzed in the LCS so that the full range of potential leachate contaminants is accurately established based on actual monitoring data. This monitoring needs to continue until steady state conditions are demonstrated and a formal statistical monitoring procedure (consistent with the regulations) is established for the full range of constituents.

32. Commenting Organization: OEPA

Section #: 6 Pg #: 6-2 Line #: 21 Code: C

Comment: Step 4 reflecting impacted material placement should be removed from this table.

Volume II – Attachment C

Appendix B

33. Commenting Organization: OEPA

Section #: Appendix B Pg #: B-1 Line #: 21 Code: C

Comment: Figure 1-1 should be revised to show the proper locations of the GMA monitoring wells.

34. Commenting Organization: OEPA
Section #: Appendix B Pg #: B-3 Line #: 23 Code: C
Comment: See Comment #31.

35. Commenting Organization: OEPA
Section #: Appendix B Pg #: B-3 Line #: 24 Code: C
Comment: The referenced text should be revised. A quarterly monitoring frequency should be maintained so that sufficient data are collected on a timely basis for resolution of the trend issues that preclude the establishment of steady state baseline conditions. Quarterly monitoring needs to continue to capture, as expeditiously as possible, the establishment of steady state conditions.

36. Commenting Organization: OEPA
Section #: Appendix B Pg #: B-9 Line #: 30 Code: E
Comment: The LMS acronym is not defined.

**Volume II – Attachment C
Appendix C**

37. Commenting Organization: OEPA
Section #: Appendix C Pg #: C-2 Line #: 32 Code: C
Comment: See Comment #31.

**Volume II – Attachment C
Appendix D**

38. Commenting Organization: OEPA
Section #: Appendix D Pg #: D-5 Line #: 1 Code: C
Comment: Table 3-1 should specify the frequency for inspection of the automated equipment used in the OSDF Leachate Management System (tank level indicators, alarms, pumps, etc.).

39. Commenting Organization: OEPA
Section #: Appendix D Pg #: D-7 Line #: 17 Code: C
Comment: The text indicates that if leachate toxicity and volumes decrease, DOE may petition to modify or suspend leachate management requirements. If the proposed reductions in the annual leachate sample analyses set forth in this plan are implemented, however, efforts to achieve such modification or suspension of leachate management requirements would be hindered because of the lack of sufficient data to substantiate any toxicity decrease.

40. Commenting Organization: OEPA
Section #: Appendix D Pg #: D-8 Line #: 22 Code: C
Comment: The proposed revisions (discontinue tanker transport in the event of a line failure, work to repair the line(s) prior the accumulation of 8,623 gallons in any cell, and the use of temporary tanker or portable tank if repairs take longer than anticipated) to the leachate management contingency plan is reasonable.

Volume II – Attachment C

Appendix E

41. Commenting Organization: OEPA

Section #: Appendix E Pg #: E-14

Line #: 25

Code: C

Comment: See Comment #31.

Volume II – Attachment D

Integrated Environmental Monitoring Plan

42. Commenting Organization: OEPA

Section #: IEMP Pg #: N/A Line #: N/A Code: C

Comment: Some sections of the document do not flow as well as the language from last years LMIC, 2008. One example is on n page 1-4, last paragraph of Section 1.3, lines 9-13 which begins to discuss the IEMP's organizational structure. However it doesn't explain that the IEMP's job is to "assess the continued protectiveness of the remedial actions" that are in place at the site. The new text, Sections 1.4 – 1.8, appears to be misplaced. Some of the old language from last year's LMIC, Sections 1.4 – 1.4.4, would provide the background for why the job of the IEMP works to protect remedial action decisions and the importance of keeping them in place.

In addition, there are three terms critical to understanding this document which should be defined up front: Program, Plan, and Project. Also, the relationship of these terms to each other should be included. For example section 1.2, describes the Program Objectives and Scope which appears to refer to the IEMP (the Program). Whereas, Section 3.0 refers to the Groundwater Monitoring Program, indicating the Program is medium specific (see also Sections 3.3, 3.4, and 3.5). However, Section 3.0 reference is made to the medium-specific plan (Section 3.6) and Section 1.3 appears to specify each medium as a section of the Plan. Projects appear to fall into a specific medium (Section 1.4: "The project team leader will have full responsibility and authority for the implementation of the medium-specific plan") but it is unclear what constitutes a "project". Perhaps along with definitions, a flow chart or other graphic would help to understand the organization and relationship of these terms/components.

43. Commenting Organization: OEPA

Section #: IEMP 1.0 Pg #: 1-1 Line #: 2-11 Code: C

Comment: The statement is made that "The Integrated Environmental Monitoring Plan (IEMP) is the mechanism to assess the continued protectiveness of the remedial actions." However this falls short of what the IEMP appears to be intended for. For example, in section 4.0, it's stated that the IEMP also includes the following aspects "The discharge monitoring and reporting program related to the site's NPDES Permit... fulfill DOE Order 450.1A requirements to maintain an environmental monitoring plan for surface water... address the concerns of the community regarding the magnitude of the Fernald Preserve's discharges to surface water... monitoring of ecological impacts to wetlands, threatened and endangered species, and terrestrial and aquatic habitats". It seems appropriate to include items such as these in the introduction.

44. Commenting Organization: OEPA

Section #: IEMP 1.7 Pg. #: 1-5 Line #: 35-36 Code: C

Comment: This section states that "For surface water, field data documentation will be at ASL A and laboratory data documentation will be at ASL D." Will these analytical levels be consistent with NPDES requirements (e.g. data collected at the Parshall flume such as continuous pH)? It would appear as though data analytical levels for field collected data may be subject to different requirements.

45. Commenting Organization: Ohio EPA

Section #: 2.1 Pg #: 2-1 Line #: 21-22 Code: C

Comment: DOE's acceptance of Flour-Fernald's declaration of closure in January 2007. January 1, 2007, was the beginning of the first year of closure for the RAD NESHAPs requirement under Subpart H. Per USEPA consultation there is a three year monitoring requirement after site closure. This means that the last reportable year of monitoring will be for CY 2009, and the report will be due June 30, 2010.

46. Commenting Organization: Ohio EPA

Section #: 2.1 Pg #: 2-1 Line #: 21-22 Code: C

Comment: Since all of the material that made the site applicable to Subpart Q has been removed from the site, there is no additional radon monitoring requirement.

47. Commenting Organization: Ohio EPA

Section: 3.4.2.1 Pg#: 3-8 Line#: 41-46 Code: C

Comment: DOE has left out a couple paragraphs of information which had provided explanation in regards to Section 3.4.2.1, lines 41-46. It is important to discuss the issue of changes that were made to the uranium FRL concentration in groundwater. This is an important issue that took place at Fernald and leads into the contents of this paragraph on page 3-8, lines 41-46.

48. Commenting Organization: OEPA

Section #: IEMP 4.1 Pg. #: 4-1 Line #: 13-19 Code: C

Comment: The first paragraph of this section has been stricken; however it appears there is value to keeping this paragraph, since it explains why surface water is monitored and to verify whether Fernald's discharges fall below established thresholds. In addition, this section should be relocated before Section 4.1 and modified it to reflect surface water, treated effluent, and sediment.

49. Commenting Organization: OEPA

Section #: IEMP 4.1 Pg. #: 4-1 Line #: 31 Code: C

Comment: The strike out "accommodate surface water monitoring-during post-closure," should be left in as it is historically correct and consistent with Revision 0 of the IEMP.

50. Commenting Organization: OEPA

Section #: IEMP Table 4-1 Pg. #: 4-3 Line #: N/A Code: C

Comment: Missing from this table is DOE Order 231.1A, Environment, Safety, and Health Reporting. The objectives of this order include "To ensure timely collection, reporting, analysis, and dissemination of information on environment, safety, and health

issues as required by law or regulations or as needed..." which appears to be an appropriate driver for a monitoring plan.

51. Commenting Organization: OEPA

Section #: IEMP 4.3.2.1 Pg. #: 4-5 Line #: 17-19 Code: C

Comment: This section that discusses sediment sampling location and frequency should be placed in a more appropriate location in the document.

52. Commenting Organization: OEPA

Section #: IEMP 4.3.2.3 Pg. #: 4-13 Line #: 1-4 Code: C

Comment: Previously, calculations were also made based on the actual low flow observed at the nearest gauge station for that year and reported in the ASER. Will this practice continue?

53. Commenting Organization: OEPA

Section #: IEMP 4.3.2.3 Pg. #: 4-13 Line #: 3-4 Code: C

Comment: Please provide a justification for the additional line stating that calculations will not be required in the case of some exceedences.

54. Commenting Organization: Ohio EPA

Section: 4.3.2.5 Pg#: 4-17 Line#: 26-31 Code: C

Comment: This section does not provide an explanation as to why surface water background monitoring is being performed. The "strike-out" text provides the information needed in regards to background monitoring and comparison to the concentrations from the monitoring locations. It is important and provides the reason for comparing the two sets of values to the monitoring results.

56. Commenting Organization: OEPA

Section #: IEMP 4.3.1 Pg. #: 4-4 Line #: 25-27 Code: C

Comment: The community has also expressed concern about the lentic systems on the site (open water areas and wetlands), not just limited to Paddys Run and the Great Miami River.

57. Commenting Organization: OEPA

Section #: IEMP Table 4-3 Pg. #: 4-14 Line #: N/A Code: C

Comment: This table needs to be modified to include sediment.

58. Commenting Organization: OEPA

Section #: IEMP Table 4-1 Pg. #: 4-3 Line #: N/A Code: C

Comment: DOE/EH 0173T, January 1991 which supports DOE Order 5400.5 (The purpose of this regulatory guide is to establish elements of a radiological effluent monitoring and environmental surveillance program considered acceptable to DOE, in support of DOE 5400.5 (Radiation Protection of the Public and the Environment) and DOE 5400.1 (General Environmental Protection Program)) states that :
Periodic Confirmation Environmental surveillance measurements may be performed periodically, but should* be performed at least every five years, to confirm the low dose levels, if the projected annual effective dose Equivalent of site origin is ≤ 0.1 mrem...

Per the above, sediment sampling need not be performed annually but at least once every five years. Likewise, sampling of fish in the Great Miami River should* occur at least once every five years.

59. Commenting Organization: OEPA

Section #: IEMP 4.3.2.2 Pg. #: 4-9 Line #: 31-32 Code: C

Comment: The upgradient location name should be included (e.g. SWD-05).

60. Commenting Organization: OEPA

Section #: IEMP 4.3.2.5 Pg. #: 4-18 Line #: 7-9 Code: C

Comment: It appears as though the background value for cobalt in the GMR has changed from the previous IEMP. Will changes be made annually and if so please include these in the Significant Changes Summary.

61. Commenting Organization: OEPA

Section #: IEMP 4.3.2.8 Pg. #: 4-20 Line #: 33-36 Code: C

Comment: Parts of 450.1A indicate that the site should "Participate in voluntary environmental partnership programs where there is a programmatic benefit from doing so". The site has been pro-active in this regard engaging organizations such as the Audubon Society and local schools. However I don't believe the site has contacted the "Friends of the Great Miami" yet and encourage you to do so. The presidents contact information is:

Mr. Brian Bohl, Stream Specialist
Hamilton County Soil & Water Conservation District
29 Triangle Park Drive, Suite 2901
Cincinnati, Ohio 45246
Office: (513) 772-7645, ext. 15
Fax: (513) 772-7656
Cell: (513) 253-3460
brian.bohl@hamilton-co.org

62. Commenting Organization: OEPA

Section #: IEMP 4.3.2.9 Pg. #: 4-20 Line #: 39-44 Code: C

Comment: The community has also expressed concern about the lentic systems on the site (open water areas and wetlands), not just limited to Paddys Run and the Great Miami River. Although the site has sampled many of the onsite water bodies, some schedule of (limited) sampling should be developed to continue to demonstrate to the public that there is no need for concern with the onsite water bodies relative to contamination.

63. Commenting Organization: OEPA

Section #: IEMP 4.3.3 Pg. #: 4-21 Line #: N/A Code: C

Comment: It is unclear how this section relates to the rest of the surface water sampling. As indicated above the distinction between Program, Plan, and Project is unclear as is their relationship to each other.

64. Commenting Organization: Ohio EPA

Section #: 5.2 Pg #: 5-1 Line #: 41-42 Code: C

Comment: Correct the historical basis for the air monitoring program. After 1998, 16 air monitors were placed around the site boundary in addition to two background samplers. When the majority of remedial actions were completed in 2006, the number of air samplers was reduced to five.

65. Commenting Organization: Ohio EPA

Section #: 5.2 Pg #: 5-1 Line #: 38-44 Code: C

Comment: Dose assessment should be conducted at the point of the maximally exposed individual, which should be somewhere along the fence line of the OSDF. The site does not have any air monitoring data that would be suitable to use for this scenario. DOE should consider limited air monitoring along the perimeter of the OSDF fence line.

66. Commenting Organization: Ohio EPA

Section #: 5.7.2 Pg #: 5-19 Line #: 41-47 Code: C

Comment: Another potential receptor that should be considered is a person along the perimeter of the OSDF fence. This is the closest unrestricted access to the remaining source term at Fernald.

67. Commenting Organization: Ohio EPA

Section #: na Pg #: na Line #: na Code: C

Comment: DOE should also consider leaving high volume air samplers in operation until after the first controlled burn. This will allow for the evaluation of potential airborne releases at the time of the controlled burn.

68. Commenting Organization: Ohio EPA

Section: 6.1 Pg#: 6-1 Line#: First paragraph Code: E

Comment: The beginning of the first sentence, in red, should remain as the introductory sentence of this paragraph. It provides a much better lead into the monitoring summary. In addition, the individual mediums and their monitoring program should remain as well. As the text stands, it reads as though groundwater is the only medium evaluated at the site.

Volume II – Attachment E Community Involvement Plan

69. Commenting Organization: OEPA

Section #: CIP 5.1.1 Pg. #: 5-1 Line #: 33 Code: C

Comment: Site inspections are conducted quarterly, not annually. Portions of the quarterly inspections have been modified so that field conditions are more favorable for a more thorough inspection. Please modify sentence to read, "These meetings will...present the results of quarterly inspections."

70. Commenting Organization: OEPA

Section #: CIP Appendix A Pg.#: A-3 Line #:N/A Code: C

Comment: Appendix A of the CIP needs contacts updated to reflect election results.