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State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

February 3, 2009

Frank Johnston
Fernald Preserve Site Manager
10995 Hamilton-Cleves Highway
Harrison, OH 45030

RE: Ohio NPDES Permit No. 11O00004*HD, Fernald Preserve

Dear Mr. Johnston:

This is a response to your December 22, 2008 comment letter on the draft permit. Your comments are addressed in the order they appeared in your letter.

1. Comment: *Much of the proposed sampling at Outfall 4001 is no longer justified based on actual measurements under the current NPDES permit. The following constituents were proposed by Stoller to be eliminated: Arsenic, beryllium, barium, boron, cadmium, chromium, chromium (dissolved hexavalent,), antimony, cobalt, copper, lead, molybdenum, nickel, selenium, silver, zinc, chloroform, 1,1-dichloroethane, trichloroethene, ammonia, total residual chlorine, fecal coliform, acute and chronic toxicity testing.*

Response: Ohio EPA agrees to the removal of sampling requirements for the above constituents. Acute and chronic toxicity testing was inadvertently added and will be removed.

2. Comment: *Page 8 identifies the down stream monitoring location as 901. It appears this is a typographical error and should be 902 consistent with the current permit and the sampling station descriptions listed on page 9 of the draft permit.*

Response: The table for Downstream-Nearfield Monitoring has been changed to 902.

3. Comment : *The loading calculations for outfall 4001 are based on an average flow rate of 5.83 MGD. We believe the loading should be based on the average flow rate of 6.20 MGD from the Water Flow Schematic contained in the NPDES Application.*

Response: As was noted in a discussion with Stoller after these comments were submitted, although 6.20 MGD were reported on the Water Flow Schematic, the number used to calculate the average flow rate is what is submitted on the form 2C which asks for the flow from all operations. This flow as submitted in the application was 5.83 MGD and was therefore correct for the loading calculation. Since the original submittal of the application, Stoller has collected more data and submitted an updated form 2C stating 6.7 MGD as the total amount discharged from outfall 001. New loading rates for the permit were calculated using 6.7 MGD as the average design flow.

4. Comment: *There is proposed monitoring for pH minimum and pH maximum for Outfall 003 on Page 5. There should only be one pH sample collected and the specified limits should be 6.5 for the minimum and 9.0 for the maximum.*

Response: The table for Outfall 003 has had the pH Parameter code changed to 00400, which requires a single grab sample.

5. Comment: *The Public Notice contains incorrect facility information. As indicated in the NPDES Permit Application, EPA Form 3510-1, the facility where the discharge occurs is U.S. DOE Fernald Preserve, 7400 Willey Road, Harrison, OH 45013.*

Response: It is unclear why the wrong information was presented in the Public Notice. After contact from Stoller with OEPA Central Office, it appears all information is correct in the databases. The permit lists the correct facility information.

If you have any questions, please contact me by phone at (937) 285-6028 or by e-mail at michelle.waller@epa.state.oh.us.

Respectfully,



Michelle Waller
Environmental Specialist II
Division of Surface Water

Cc: Jane Powell, DOE-LM
Mary Sizemore, Stoller