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John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

September 16, 2013

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

**RE: DRAFT COMMENTS – DRAFT ANNOTATED OUTLINE ON THE OPERATIONAL
DESIGN ADJUSTMENT – 1, WSA PHASE-II GROUNDWATER REMEDIATION
DESIGN**

Ms. Powell:

Ohio EPA has received and reviewed Fernald Preserve's "Draft Annotated Outline on the Operational Design Adjustment – 1, WSA Phase-II Groundwater Remediation Design", dated September 10, 2013. Ohio EPA comments are enclosed.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider
Fernald Project Mgr
Division of Environmental Response and Revitalization
Federal Facilities Section

TAS/tb

cc: Tim Fischer, U.S. EPA
Bill Hertel, Stoller Corp.
Matt Justice, Ohio EPA SWDO

**OHIO EPA COMMENTS ON THE DRAFT ANNOTATED OUTLINE
ON THE OPERATIONAL DESIGN ADJUSTMENT-1, WSA
PHASE-II GROUNDWATER REMEDIATION DESIGN**

COMMENTS:

1. Commenting Organization: Ohio EPA

Commentor: DDAGW

Section 2.0 - Background

Comment:

In describing the application of the fate and transport model for optimizing the ground water extraction system, please include a summary discussion of model strengths and limitations. Because mass removal predictions are becoming progressively less predictive, Ohio EPA requests that the proposal specifically summarize the following:

- a. Model input assumptions, strengths and limitations
- b. Potential on-site uranium source, and potential influence on predictive accuracy
- c. Input parameter sensitivity
- d. Model validation summary, i.e. how well model predicted uranium concentrations compare to analytical results

2. Commenting Organization: Ohio EPA

Commentor: DDAGW

Section 2.3 - Current Status of Aquifer Restoration

In addition to discussing remedy achievements as stated, Ohio EPA requests that the proposal summarize challenges to uranium final remedial level (FRL) attainment. The summary should discuss the following:

- a. Number and location of extraction wells with asymptotic mass removal, and uranium concentrations above the FRL
- b. Number and location of monitoring wells with uranium concentrations in excess of the FRL
- c. Locations where ground water uranium concentrations could be indicative of remaining residual source
- d. Extraction well shutdown rebound potential above the uranium FRL

3. Commenting Organization: Ohio EPA

Commentor: DDAGW

Section 4.0 Modeling Considerations for Optimizing the Baseline Alternative

In the proposed discussion of considerations evaluated for optimizing the ground water extraction system, please include evaluation of hydraulic containment. Proposed adjustments to the ground water extraction should demonstrate that hydraulic containment will be maintained.