

**RESPONSES TO OEPA COMMENTS
ON THE INTEGRATED ENVIRONMENTAL
MONITORING STATUS REPORT FOR
THIRD QUARTER 2000**

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
FERNALD, OHIO**

APRIL 2001

U.S. DEPARTMENT OF ENERGY

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lighter than water constituent to be present in a Type 3 well and not present in the Type 2 well at the same location.

Action: DOE will try to provide clearer write-ups in future Integrated Environmental Monitoring Plan reports.

4. Commenting Organization: OEPA Commentor: OFFO
Section #: 2 Pg.#: Figure 2-3 Line #: Code: C
Original Comment #: 4
Comment: The addition of weekly precipitation data to the LDS accumulation rate's figure began a quarterly report or two ago. We find this addition valuable and it should continue.
Response: DOE acknowledges the comment.
Action: DOE will continue to provide weekly precipitation data along with the on-site disposal facility leak detection system (LDS) accumulation rates.

5. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.1.1; 2.2.1 and 2.3.1 Pg.#: Line #: Code: C
Original Comment #: 5
Comment: We cannot shed any light on the LDS accumulation rates. We have several observations and comments but concede that DOE probably will not be able to explain them better than we can:

1. Why is the volume in LDS for Cell 3 so low? Is the primary liner of Cell 3 that much better than the other two primary liners? Is water 'leaking' from the LDS piping before it can be measured at the manhole?
2. The variation of the flow in LDS Cell 2 is puzzling. One year ago there appeared to be a strong correlation between rainfall and volume. This Spring, the volume increase appeared to coincide with the beginning of waste placement. Cell 2 flows have continued to decline since waste placement stopped this Fall. We will all be watching to see if the volume increases when waste placement starts again this year.
3. Cell 1 flows have been more consistent than Cell 2. There appears to be no correlation with rainfall. Allowing for several months of lag time, it is possible to infer a correlation between the beginning of waste placement in March 2000 and increased flows that started in June and July. We note, however, that the increased flows have continued to January 2001.

Response: DOE acknowledges the comment. Responses to the numbered items as follows:

1. We may never know the exact reason why the Cell 3 LDS volume has been so low. A plausible possibility was provided in the 1999 Integrated Site Environmental Report, Appendix A, Attachment A.6, Section A.6.3.1, Page A.6-9. Video inspections of the Cell 3 LDS pipe conducted in November 1999 and December 2000 both indicated the pipe was not obstructed. The December 2000 video inspection indicated the LDS line was dry from the cleanout to well beneath Cell 3 indicating that water is not 'leaking' from the LDS piping before it can be measured at the manhole.
2. DOE agrees that it will be interesting to see if the Cell 2 LDS accumulation rates respond to waste placement, as they appear to have last year.
3. DOE acknowledges the comment. The Cell 1 LDS flow has generally been decreasing since peaking in late December 2000-early January 2001.

Action: No action required.