



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6404

Bob Taft, Governor
Maureen O'Connor, Lt. Governor
Christopher Jones, Director

March 21, 2002

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

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RE: FORMAL SUBMISSION OF COMMENTS ON OSDF BASELINE DATA

Dear Mr. Reising:

This letter provides the formal Ohio Environmental Protection Agency comments on the Data Package for Baseline Groundwater Conditions at the ON-Site Disposal Facility Cells 1, 2 and 3. These comments have been provided by e-mail to several members of DOE and Fluor Fernald staff. We discussed our comments during a conference call on March 12, 2002. The following summarizes our understanding of the conclusions reached during the call.

- In general, we agreed that the statistical analysis of the data was consistent with United States Environmental Protection Agency guidance.
- The LCS and LDS will be sampled annually for all 16 constituents.
- If a constituent is detected in the LCS or LDS then at least three quarterly confirmatory samples will be collected.
- Depending on the magnitude and persistence of the detect in the LCS or LDS
- All horizons will be sampled quarterly for those constituents which have detects greater than 25% of the time including constituents which display trends or serial correlation.

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- Control charts for all constituents will be updated annually.
Should you have any questions, please contact Tom Ontko or me.

Sincerely,

Tom Ontko

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

cc: Jim Saric, U.S. EPA
Terry Hagen, Fluor Fernald
Mark Shupe, GeoTrans, Inc.
Francie Hodge, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

