



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

4300

FERNALD _____
LOG C-1330

JUN 04 2002 2002 JUN -6 A 10:24

REPLY TO THE ATTENTION OF: _____

Mr. Johnny Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

SRF-5J

RE: OSDF Baseline Groundwater
Conditions RTC

Dear Mr. Reising:

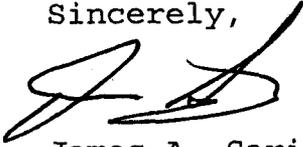
The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Responses to Comments (RTC) on the draft data package for baseline groundwater conditions at the On-Site Disposal Facility (OSDF) Cells 1, 2, and 3.

The RTC have adequately addressed all of U.S. EPA's previous comments except one, which is enclosed. The nature of that comment is the correlation between rising groundwater levels and increased total uranium concentrations in groundwater. U.S. DOE responded to U.S. EPA's comment in too general terms. This issue should be the subject of a rigorous review by U.S. DOE because of the significant ramifications associated with the issue.

Therefore, U.S. EPA disapproves the document pending receipt of an adequate response to the enclosed comment. A conference call to discuss this issue may be necessary. U.S. DOE must submit a revised document and response within thirty (30) days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,



James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Sally Robison, U.S. DOE-HQ
Jamie Jameson, Fluor Fernald
Terry Hagen, Fluor Fernald
Tim Poff, Fluor Fernald



bcc w/enclosure:

Mary Wojciechowski, Tetra Tech
Gene Jablonowski, SRF-5J

bcc w/o enclosure:

Brian Barwick, ORC

TECHNICAL REVIEW OF
"COMMENT RESPONSES ON THE DRAFT DATA PACKAGE FOR BASELINE
GROUNDWATER CONDITIONS AT THE ON-SITE DISPOSAL FACILITY
CELLS 1,2, and 3"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENT

Commenting Organization: U.S. EPA
Section #: 4.3.1 Page #: 4-4
Original Specific Comment #: 7

Commentor: Saric
Lines #: NA

Comment: The original comment requested that the U.S. Department of Energy (DOE) discuss similar increases in total uranium concentrations in groundwater samples collected after rises in groundwater levels. DOE responded to this comment in a very general way. The correlation between rising groundwater levels and increased total uranium concentrations in groundwater should be subjected to a rigorous review; the qualitative observations made in the original report and comment response are inadequate. This rigorous review is required for the On-Site Disposal Facility (OSDF) area because of the significant ramifications associated with the issue, such as potential identification of a release from the OSDF, identification of another contaminant plume, or natural variation of ground water quality. In addition to this review, additional field work may be necessary to clearly identify the source of the total uranium increases. A similar review should be conducted in other areas of the Fernald Environmental Management Project site.