



State of Ohio Environmental Protection Agency

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D-1315

August 8, 2003

Mr. Johnny Reising
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, OH 45329-8705

RE: COMMENTS - 2002 SITE ENVIRONMENTAL REPORT

Dear Mr. Reising:

Ohio EPA has reviewed the 2002 Site Environmental Report (2002 Environmental Summary) 51350-RP-0022 Rev 0 Final submitted by DOE on May 30, 2003. Ohio EPA's comment's on the 2002 SER are enclosed.

If there are any questions, please contact me at (937) 285-6466 or Donna Bohannon at (937) 285-6543.

Sincerely,

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

- cc: Jim Saric U.S. EPA
- Terry Hagen, Fluor Daniel Fernald
- Francis Hodge, Tetrattech
- Ruth Vandegrift, ODH
- Mark Schupe, HSI Geotrans

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6. Commenting Organization: OEPA
 Section #: Attachment A.2 Pg.#: A.2-4
 Original Comment #:
 Comment: The water level data for all OSDF monitoring wells with the exception of 22198 is not available on the Fernald web site. Please provide electronic access to the water level monitoring data for all OSDF monitoring wells.

Commentor: GeoTrans, Inc.
 Line #: 2 Code: C

7. Commenting Organization: OEPA
 Section #: Attachment A.2 Pg.#: A.2-4
 Original Comment #:
 Comment: The slopes of the regression trend lines (uranium or water level versus time) do not appear to be significant. The comparison of the trend lines that was performed do not, therefore, seem to be a conclusive test for the presence/absence of a significant relationship between water levels and uranium concentrations at a well. A more direct approach would be to regress the quarterly concentration data directly against the quarterly water level data.

Commentor: GeoTrans, Inc.
 Line #: 10 Code: C

8. Commenting Organization: OEPA
 Section #: Attachment A.2 Pg.#: A.2-4
 Original Comment #:
 Comment: Some discussion of the results of the analysis is warranted. The conclusion that a meaningful correlation between water levels and concentrations exists should be tempered by a recognition of the numerous factors that also may effect concentrations. Concentration changes are at least partially a function of advection/dispersion processes that are not at all related to the water level trend. For example, if the given well is located in an area into which lower concentration groundwater is moving, concentrations would trend downward regardless of the trend in water levels.

Commentor: GeoTrans, Inc.
 Line #: 10 Code: C

9. Commenting Organization: OEPA
 Section #: Attachment A.2 Pg.#: A.2-4
 Original Comment #:
 Comment: It is not clear from the discussion provided and the analysis performed how the correlation between water levels and total uranium concentrations is "time-dependent." Specifically the analysis did not identify periods of a given well's record when significant water level or concentration trends did exist and a correlation could be established versus periods when they did not.

Commentor: GeoTrans, Inc.
 Line #: 11 Code: C

10. Commenting Organization: OEPA
 Section #: Attachment A.3 Pg.#: A.3-1
 Original Comment #:
 Comment: The text is misleading because it presents the BRSR 10-year, uranium-based

Commentor: GeoTrans, Inc.
 Line #: 23 Code: C

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restoration footprint without qualification. The IEMP dated January 2003 indicates that the current groundwater remediation design is modified from the BRSR design and, therefore, the restoration footprint presented in the BRSR is no longer applicable to the remedy. The text should discuss progress in updating the footprint and why it is not updated for this report.

11. Commenting Organization: OEPA
 Section #: Attachment A.4 Pg.#: A.4-2
 Original Comment #:

Commentor: GeoTrans, Inc.
 Line #: 35 Code: C

Comment: The text is incorrect in stating that Nickel was a "<" constituent in one or more aquifer zones. It is designated as ">N" in all five aquifer zones.

12. Commenting Organization: OEPA
 Section #: Attachment A.5 Pg.#: A.5-7
 Original Comment #:

Commentor: GeoTrans, Inc.
 Line #: 2 Code: C

Comment: To improve the clarity of this discussion, the term "Combined" should be changed to "Overall" to make the text consistent with the summary table (or vice versa).

13. Commenting Organization: OEPA
 Section #: Attachment A.5 Pg.#: A.5-9
 Original Comment #:

Commentor: GeoTrans, Inc.
 Line #: 33 Code: C

Comment: The inverse correlation noted may not be meaningful because other factors (e.g., advective/dispersive mass transport) may be causing the observed trend.

14. Commenting Organization: OEPA
 Section #: Attachment A.5 Pg.#: A.5-10
 Original Comment #:

Commentor: GeoTrans, Inc.
 Line #: 22 Code: C

Comment: According to "Technical Memorandum for the On-Site Disposal Facility Cells 1, 2, and 3 Baseline Groundwater Conditions" Section 5.2.1 entitled Post-Baseline Monitoring, the 16 leak detection indicator constituents were to be analyzed in annual samples collected from the LDS. The results of these analyses should also be discussed in this section.