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NOV 24 2003

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0055-04

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF THE INTEGRATED ENVIRONMENTAL MONITORING PLAN
MID-YEAR DATA SUMMARY FOR 2003 AND RESPONSES TO THE ADDITIONAL
OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENT ON THE 2002 SITE
ENVIRONMENTAL REPORT**

Reference: Letter, DOE-0272-01, J. Reising to J. Saric and T. Schneider, "Transmittal of the Integrated Environmental Monitoring Plan, Revision 2 Final and Responses to the United States Environmental Protection Agency and Ohio Environmental Protection Agency Comments on the Integrated Environmental Monitoring Plan, Revision 2 Draft Final (Comment #50 provided in package)," dated January 25, 2001

Enclosed is the Integrated Environmental Monitoring Plan (IEMP) Mid-Year Data Summary for 2003 that summarizes the January 1 through June 30 environmental monitoring results. The IEMP data continues to be provided to the United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA) via the IEMP Data Information Site (i.e., the "Extranet Site"), at <http://iempdata.fernald.gov>, as the data become available.

Also in October 2003, DOE received one additional comment from the OEPA on the 2002 Site Environmental Report. The response to this comment is provided in this package along with response to Comment #50 on the IEMP, Revision 2 Draft Final (reference).

NOV 24 2003

Mr. James A. Saric
Mr. Tom Schneider

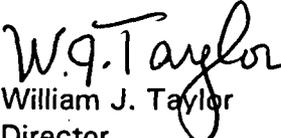
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DOE-0055-04

If you have any questions concerning the enclosed documents or the IEMP Data Information Site, please contact Ed Skintik of my staff at (513) 648-3151. Questions on the IEMP Data Information Site can also be addressed by clicking on the "Data Questions" email link found at the top of the IEMP Data Information Site screen.

Sincerely,

FCP:Skintik


William J. Taylor
Director

Enclosure: As Stated

cc w/enclosure:

D. Lojek, OH/FCP
J. Reising, OH/FCP
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T. Schneider, OEPA-Dayton (total of 3 copies of enclosure)
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M. Cullerton, TetraTech
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M. Jewett, Fluor Fernald, Inc., MS52-5
T. Poff, Fluor Fernald, Inc., MS65-2
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ECDC, Fluor Fernald, Inc., MS52-7

**RESPONSE TO ADDITIONAL OEPA COMMENT ON THE
2002 SITE ENVIRONMENTAL REPORT**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

NOVEMBER 2003

U.S. DEPARTMENT OF ENERGY

DOE agrees that some of the measurements fall slightly within the CrO_4^{2-} stability field, as calculated for the maximum observed chromium concentration. However, it is noted that the samples in the CrO_4^{2-} field are predicted to be stable with respect to chromium VI from a thermodynamic perspective. In reality, the kinetics of oxidation are likely to require much higher oxygen levels and/or a catalyst to initiate the oxidation of chromium III or IV to chromium VI. If the assumption is made that the oxidation kinetics are instantaneous (a poor assumption), then the same assumption should be made for the reduction kinetics. That is, as soon as the chromium VI migrates outside the slightly elevated oxygen, zone it will be reduced to chromium IV or III.

Although DOE believes that monitoring for chromium VI is not needed, the chromium VI monitoring will be conducted every five years in areas near re-injection, as suggested by the EPAs.

Action: DOE will modify the IEMP by revising the chromium VI monitoring requirements as noted in the response.

REFERENCES

U.S. Dept. of Energy, 2001, "Addendum to the CERCLA/RCRA Background Soil Study",
Fernald Environmental Management Project, U.S. Dept. of Energy, Fernald Field Office, Cincinnati, Ohio.