



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

ERNA LD  
LOG E-0250

DEC 10 2003

2003 DEC 11 A 10:31  
REPLY TO THE ATTENTION OF  
FILE: 10446-7A  
SRF-6J  
LIBRARY: \_\_\_\_\_

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

RE: 2003 IEMP Proposed Changes

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) proposed changes resulting from the 2003 annual review of the Integrated Environmental Monitoring Plan (IEMP). The document proposes changes to the IEMP for the remaining portion of 2003 and 2004.

U.S. EPA has enclosed comments on the proposed changes. Therefore, U.S. EPA does not approve all of U.S. DOE's proposed changes to the IEMP.

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-HDQ  
Jamie Jameson, Fluor Fernald  
Terry Hagen, Fluor Fernald  
Tim Poff, Fluor Fernald

TECHNICAL REVIEW COMMENTS ON  
"PROPOSED CHANGES RESULTING FROM THE 2003 ANNUAL REVIEW OF THE  
INTEGRATED ENVIRONMENTAL MONITORING PLAN, REVISION 3"

FERNALD CLOSURE PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: D.4.1.2 Page #: D-8 Line #: Not Applicable  
(NA)

Specific Comment #: 1

Comment: The proposed change suggests that additional bat surveys be eliminated because no further ecological restoration in suitable bat habitat is planned and because bat surveys are not included in the scope of monitoring for restored areas or in the draft natural resource restoration plan. Ecological restoration is planned for the Paddy's Run Corridor, which contains suitable bat habitat. Therefore, bat surveys should not be eliminated.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: Attachment D Page #: NA Line #: NA  
Specific Comment #: 2

Comment: Attachment D proposes to discontinue surface water sampling driven solely by benchmark toxicity values (BTV) and to discontinue evaluations with respect to BTVs. Barium, cadmium, and silver in the surface water should continue to be monitored and the associated BTV evaluations should continue to be conducted in order to ensure that the Surface Water Monitoring Program is protective of ecological receptors.