



State of Ohio Environmental Protection Agency

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June 3, 2004

Mr. William J. Taylor
U.S. Department of Energy, Fernald Area Office
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Cincinnati, OH 45253-8705

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RE: CONDITIONAL APPROVAL OF PATH-FORWARD FOR AWWT CONVERSION

Dear Mr. Taylor:

This letter provides Ohio Environmental Protection Agency conditional approval of the path-forward for conversion of the Advanced Wastewater Treatment Facility as outlined in your letter DOE-0247-04. While the path-forward is generally as we have verbally approved, we take this opportunity to re-iterate our concerns:

1 The commitment to close the OSDF as stated on the bottom of page two is rather weak. Our approval of the carve-down approach is contingent on a firm commitment to accomplish final closure of the OSDF before December 2006 regardless of the status of the other operable units.

2 Current commitments by the Department of Energy only require treatment of groundwater to the extent necessary to comply with the Operable Unit 5 ROD. To avoid the possibility of the project reverting to 'pump and dump' in a few years, Ohio EPA expects the plant to continue treating groundwater until such time as plant inoperability prevents continued treatment. This approach is consistent with not conducting media transfer of contaminants and maintains the viability of the treatment plant should groundwater concentrations show a rebound condition.

3 The commitment to explore enhancements to aquifer remediation in lieu of the current re-injection wells is weak to the extent that the Department of Energy only commits to perform a technical evaluation followed by a presentation of the results at a meeting. The Ohio Environmental Protection Agency expects a firm commitment on the part of DOE to provide an enhanced alternative in lieu of re-injection wells. If recharge of the GMA via the Storm Sewer Outfall Ditch is unfeasible, DOE should be prepared to propose alternate enhancements to the remediation of the GMA. Possible enhancements include chemical adjustment of the GMA oxidation reduction potential or the use of lixiviating agents to enhance uranium removal. It is important to take steps to ensure the timely remediation of this important State natural resource.

Mr. William Taylor
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Should you have any questions, please contact Tom Ontko or me.

Sincerely,



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.
Michelle Cullerton, Tetra Tech EM Inc.
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