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June 22, 2004

Mr. William J. Taylor
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

RE: DISAPPROVAL OF THE PSP FOR DIRECT-PUSH SAMPLING IN AREA 3A/4A

Dear Mr. Taylor:

The stated purpose of the Project Specific Plan for Direct-Push Groundwater Sampling in the Former Soil Excavation Areas, Rev 1 determine if excavations have negatively impacted the water quality in the GMA. We believe that the Plan as written will not accomplish this goal. We have previously stated our reservations that a direct-push sample is a snap shot in time opening the possibility that contamination would be missed temporally. The plan proposes only eight pushes opening the possibility that possible contamination could also be missed in the horizontal direction.

We are also concerned that the push holes located in the deepest excavations will in the future be located in the ponds that will be left behind by the restoration program. We acknowledge that these ponds are in restored areas and we completely anticipate that remediation will prove to have achieved the remedial objectives. Never the less, we consider it questionable policy to intentional penetrate the tills in areas that are expected to be under water for hundreds of years.

Our concerns about missing a potential plume are partially mitigated by the presence of the OSDF monitoring wells located down-gradient from the area addressed by this plan. As you know, there are two 'rows' of monitoring wells , one east and one row west of the OSDF. The rows run north and south on four-hundred foot centers paralleling the OSDF. We are hopeful that no significant plume will be able to migrate past these wells without being detected.

These things being said, we acknowledge the importance of ascertaining the final infrastructure needs for the Aquifer Restoration Design. The borings at the bottoms of the excavations should be relocated by moving them eastward so that they are on the berms and not the bottoms of the excavations. Care should be taken not to re-locate any wells in the spill ways or channels which will remain after restoration.

A revised Figure 1 should be submitted along with responses to the attached additional comments. Additionally, locations of all borings (including borings from previous projects) should be located on a master map that can be used by the Remediation Project to avoid both damaging plugged boreholes and prevent locating basins above them. The FCP

should commit to a deadline for the production of this map when responding to this letter. Should you have any questions, please contact Tom Ontko or me.

Sincerely,

Tom Ontko

for 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.
Ruth Vandergrift, ODH

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Ohio Environmental Protection Agency Comments on the PSP for Direct-Push Groundwater Sampling in the Former Soil Excavation Areas

1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.2 Pg #: 9 Line #: 1st line after bullet Code: c
Comment: The text states,"Water sampling will continue at depth increments of 10 feet until the lower limit of any discovered...plume...or a depth of 20 feet below the water table has been reached". How will the depth and extent of the uranium plume be established considering the turn around time for the uranium analysis?

2) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.4 Pg #: 11 Line #: 4th Code: c
Comment: The text states, "Plugging the hole with bentonite slurry will begin 3 feet above the sand and continue to the ground surface".
We infer that the sand referred to here is the sand used to fill the borehole at the water table and does not refer to the GMA material.
It is not clear why there is a three foot interval of the borehole between the top of the sand and the bottom of the injected grout. Why isn't the grout injected continuously from the sand up to the surface?

3) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.4 Pg #: 11 Line #: last line of 1st continued paragraph Code: c
Comment: The text states, " Plugging work will be scheduled so that no boreholes will be left open over a weekend". This is not acceptable. No boreholes should be allowed to remain open over night.

4) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 7.2 Pg #: 15 Line #: last line on page Code: c
Comment: The text states, " However, a location movement of less than 25 feet will not require a variance". This is acceptable, but no boring should be moved to a location where water will pond.