



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
122 S. Front Street
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

OHIO E.P.A.

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

OCT 28 2002

ENTERED DIRECTOR'S JOURNAL

OCT 28 2002

Sharon Robinson, Site Manager
Department of Energy
Portsmouth Site Office
P. O. Box # 700
Piketon, Ohio 45661-0700

I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency.

3/10/02
Christopher Jones 10/28/02

**Re: DOE-PORTS, X-735 Industrial Solid Waste Landfill Facility, Pike County
Ohio Administrative Code (OAC) Rule 3745-29-10(E)(7)(b) Approval**

Dear Ms. Robinson:

On March 30, 2000, the Southeast District Office (SEDO) of the Ohio Environmental Protection Agency (Ohio EPA) received a report from the Department of Energy (DOE) titled *1999 Groundwater Monitoring Report DOE for the Portsmouth Gaseous Diffusion Plant (PORTS), Piketon, Ohio*. The report included data from the 1999 sampling events for the X-735 Industrial Solid Waste Landfill (X-735 Landfill).

Twenty statistically significant changes were identified within the report. In accordance with Ohio Administrative Code (OAC) Rule 3745-29-10(D)(7)(b), DOE notified the Director of the significant changes from background values.

In August 2000, DOE began the first round of assessment monitoring. Seven rounds of sampling were completed during assessment. On March 14, 2002, SEDO received a report from DOE titled *Groundwater Quality Assessment Report for the X-735 Landfill at the Portsmouth Gaseous Diffusion Plant*. The report included a ground water demonstration concluding that, based upon the assessment sampling, seventeen of the above noted statistical changes were the result of error in statistical evaluation. The remaining three changes were determined to be statistically valid; manganese in well X735-19G, potassium in well X735-20B, and cobalt in well X735-06AA.

The report further demonstrated that the cobalt found within well X735-06AA was not statistically significant when comparing it to a larger sitewide background study conducted in 1995. The report concluded that the statistical change in cobalt in well X735-06AA was likewise the result of statistical error.

The report also demonstrated that monitoring wells X-735-19G and X-735-20B are located within the buffer zone between the northern and southern sections of the landfill. Although the wells are not installed within waste, with respect to ground water movement these wells

Bob Taft, Governor
Maureen O'Connor, Lieutenant Governor
Christopher Jones, Director

are effectively within the landfill as opposed to being downgradient of the solid waste placement. For this reason, DOE requested and Ohio EPA concurs that these wells be removed from the statistical plan. Although both wells remain in place and continue to be sampled, they will not be included in future statistical evaluations of indicator parameters. The report concluded that the statistical triggers of manganese in well X735-19G and potassium in well X735-20B were the result of an error in statistical evaluation, as the plan should not have initially included these wells for statistical evaluation.

In accordance with OAC Rule 3745-29-10(E)(7)(b), DOE'S demonstration requested reinstatement of the detection monitoring program for all of the above noted wells and parameters.

Ohio EPA's Division of Drinking and Ground Waters (DDAGW) reviewed the information within this demonstration. Based on the information provided, Ohio EPA concurs with the demonstration that the above noted statistically significant changes in the ground water are the result of error in analysis and evaluation.

Pursuant to OAC Rule 3745-29-10(E)(7)(b), the owner/operator is hereby authorized to reinstate the detection monitoring program at the ~~DOE~~ X-735 Industrial Solid Waste Landfill as described in OAC Rules 3745-29-10(C) and (D) as follows: Upon the effective date of this approval, the owner/operator is no longer required to comply with OAC Rule 3745-29-10(E) for the aforementioned wells and parameters in accordance with OAC Rule 3745-29-10(D)(7)(c).

Should future or existing ground water sampling results indicate statistically significant increases in ground water monitoring parameters, the owner/operator will be required to either enter into assessment monitoring in accordance with OAC Rule 3745-29-10(E) or obtain an approval to remain in the detection monitoring program.

You are hereby notified that this action of the Director of Environmental Protection is final and may be appealed to the Environmental Review Appeals Commission (Commission) pursuant to Ohio Revised Code Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within 30 days after notice of the Director's action. Notice of the filing of the appeal shall be filed with the Director within three days after the appeal is filed with the Commission. An appeal may be filed with the Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

DOE-PORTS, X-735 Industrial Solid Waste Landfill Facility, Pike County
Ohio Administrative Code (OAC) Rule 3745-27-10(E)(7)(b) Approval
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If you have any questions concerning this letter, please contact Dan Bergert of Ohio EPA
Southeast District Office at (740) 380-5438.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher Jones". The signature is written in a cursive style with a large initial "C".

Christopher Jones
Director

cc: Sandy Colegrove, Pike County Health Department
Dave Hunt, DDAGW, SEDO
Steve Rine, DSIWM, SEDO
Scott Hester, DSIWM, CO