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UNDERGROUND STORAGE TANK REMOVAL PROJECT TRANSMITTAL OF REMOVAL SITE EVALUATION

05/03/90

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REPORT

[redacted] 283

Westinghouse
Materials Company
of Ohio

PO Box 398704
Cincinnati, Ohio 45239-8704

(513) 738 6200

WMCO:R:90-351
May 3, 1990

Mr. Gerald W. Westerbeck
FMPC Site Manager
U. S. Department of Energy
P. O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Westerbeck:

SUBJECT: UNDERGROUND STORAGE TANK REMOVAL PROJECT
TRANSMITTAL OF REMOVAL SITE EVALUATION

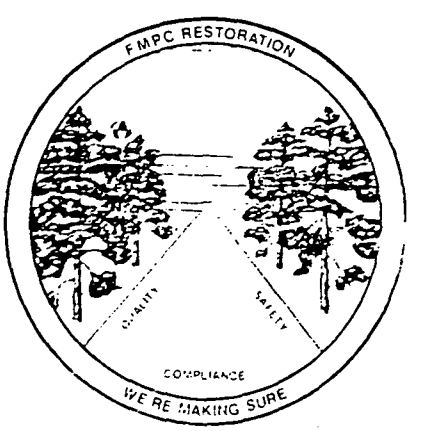
Please find the attached Removal Site Evaluation for use in your assessment of the need for a removal action in the closure of petroleum underground storage tanks here at the FMPC. Please expedite your determination in order that we may proceed with the tank closures.

If there are any questions please contact J.A. Eckstein at Extension 6404.

Very truly yours,

W.A. Weinreich, Vice President
FMPC Restoration

JAE



Attachment: Removal Site Evaluation

cc: G. R. Blank
S. L. Bradley
W. H. Britton
W. R. Den Herder
J. A. Eckstein
L. Elikan
M. J. Galper
K. C. Gessendorf
M. C. Harper
J. P. Hopper
D. Rast, DOE-FMPC
J. M. Sattler
S. G. Schneider
A. M. Schwartzman
D. A. Yaeger

Introduction

In accordance with Ohio Administrative Code (OAC), abandoned underground storage tanks must be permanently closed within a specified time frame. In order to comply with these requirements, FMPC personnel are actively seeking to close ten underground storage tanks during fiscal year 1990. Current plans call for nine of these tanks to be removed and one tank to be abandoned in place (See Page 5, FMPC Underground Storage Tank Closure Status Report and attached drawing no. 22X-5500-G-00657).

This information is presented to assist the lead agency in determining the necessity for additional controls or a removal action to address the potential threat of a release affected by the removal of the underground storage tanks. This information is intended to assist in the evaluation of the threat of a release which is present only as a result of the disturbance of the soil surrounding the tanks, which is believed to be contaminated with low levels of uranium. This document does not address the threat of a release affected by the decontamination, removal, and dismantling of the tanks. Appropriate response mechanisms for this threat are in place under Ohio underground storage tank regulations.

Source Term

The potential threat of a release will be present through the duration of the tank closures. The potential exists for the migration of airborne or waterborne uranium contamination from the excavation zone and surrounding stockpiles to the surrounding environment. Weather conditions and/or physical movement of the uranium contamination on or by personnel and equipment are the potential causes of this migration.

Evaluation of the Magnitude of the Potential Threat

The magnitude of the potential threat of migration of uranium contaminated soils may be significant under uncontrolled tank removal conditions. Surface runoff could potentially carry significant amounts of uranium contamination from soil stockpiles or the open excavations into surface runoff structures or into the area groundwater. Wind conditions could create airborne particulate which has a widespread potential for migration. However, in order to significantly reduce this potential threat, measures will be taken during the course of the tank removal to control the soil and prevent releases as follows:

1. Twenty-four hour per day de-watering of the open excavation will be performed through the use of a sump pump and portable collection tanks. The water level in the tanks will be continuously monitored to prevent overfilling. The water collected will be characterized and disposed of in accordance

with all applicable regulations.

2. Temporary dikes will be installed as necessary to minimize the amount of surface runoff entering the excavation area. This will be done to minimize the possibility of waterborne uranium entering the excavation and contaminating the subsurface soils and groundwater. This is also necessary to minimize the amount of water requiring characterization and disposal.

3. Excavated soil will be placed on and covered with plastic sheeting or stored in a container to prevent any erosion or other suspension of uranium contaminated soils. Plastic covers or containers will also help to retain soil moisture, which will preclude dusting or any other airborne migration. In the event that soils have dried to the point where dusting is possible, manual rewetting of the soils will be performed. Final soil disposition shall be in accordance with Site Policy and Procedure FMPC-720 "Control of Construction Waste". All soil sampling results will be incorporated into the RI/FS data base.

4. Rigid housekeeping rules will be set up to maintain a neat and orderly excavation site. Administrative controls will be placed on personnel and equipment to prevent the release of uranium contaminated soils from the excavation site.

Use of these soil control measures will greatly reduce the potential threat of a release. In the unlikely event that some uranium contaminated soil does become waterborne, it will enter into the stormwater sewerage, and undergo primary treatment (sedimentation) in the Stormwater Retention Basin before being released to the environment.

Assessment of the Need for Removal Action

Consistent with 40 CFR 300.65 and the National Contingency Plan, 40 CFR 300.415, the lead agency shall determine the appropriateness of a removal action. The factors to be considered in this determination are listed in 40 CFR 300.415 (b) (2). These eight factors along with a separate evaluation of each are listed below:

i. Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chain - Through the use of proper soil control procedures as stated above, the potential exposure to nearby populations, animals, or the food chain would not be significant.

ii. Actual or potential contamination of drinking water supplies or sensitive ecosystems - Through the use of proper soil control procedures as stated above, the potential uranium contamination of drinking water supplies or sensitive ecosystems would not be significant.

iii. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release - The residual pollutants contained in the underground storage tanks present a threat of a release while the tanks are in the ground as well as during removal and tank demolition. However, State of Ohio, Department of Commerce, Division of the State Fire Marshal regulations provide adequate response mechanisms to respond to any release that may or may not have occurred.

iv. High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate - Through the use of proper soil control procedures as stated above, the potential for the migration of uranium contamination will be reduced to an insignificant level.

v. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released - Through the use of proper soil control procedures as stated above, weather conditions would not cause any significant migration.

vi. The threat of fire or explosion - State of Ohio underground storage tank regulations adequately address the threat of fire or explosion in adopting procedures as published by the American Petroleum Institute (API) on the removal, decontamination, and dismantling of used underground storage tanks. The procedures that have been adopted are as follows:

API Publication 1604 - "Removal and Disposal of Used Underground Petroleum Storage Tanks"
API Publication 2015 - "Cleaning Petroleum Storage Tanks"

vii. The availability of other appropriate Federal or State response mechanisms to respond to the release - If proper soil control procedures are used, the only significant potential for a release would be from the tanks. State response mechanisms are in place through the Division of the State Fire Marshal regulations to adequately respond to any actual or potential release. The potential for a uranium contaminated soil release is insignificant.

viii. Other situations or factors which may pose threats to public health or welfare or the environment - none.

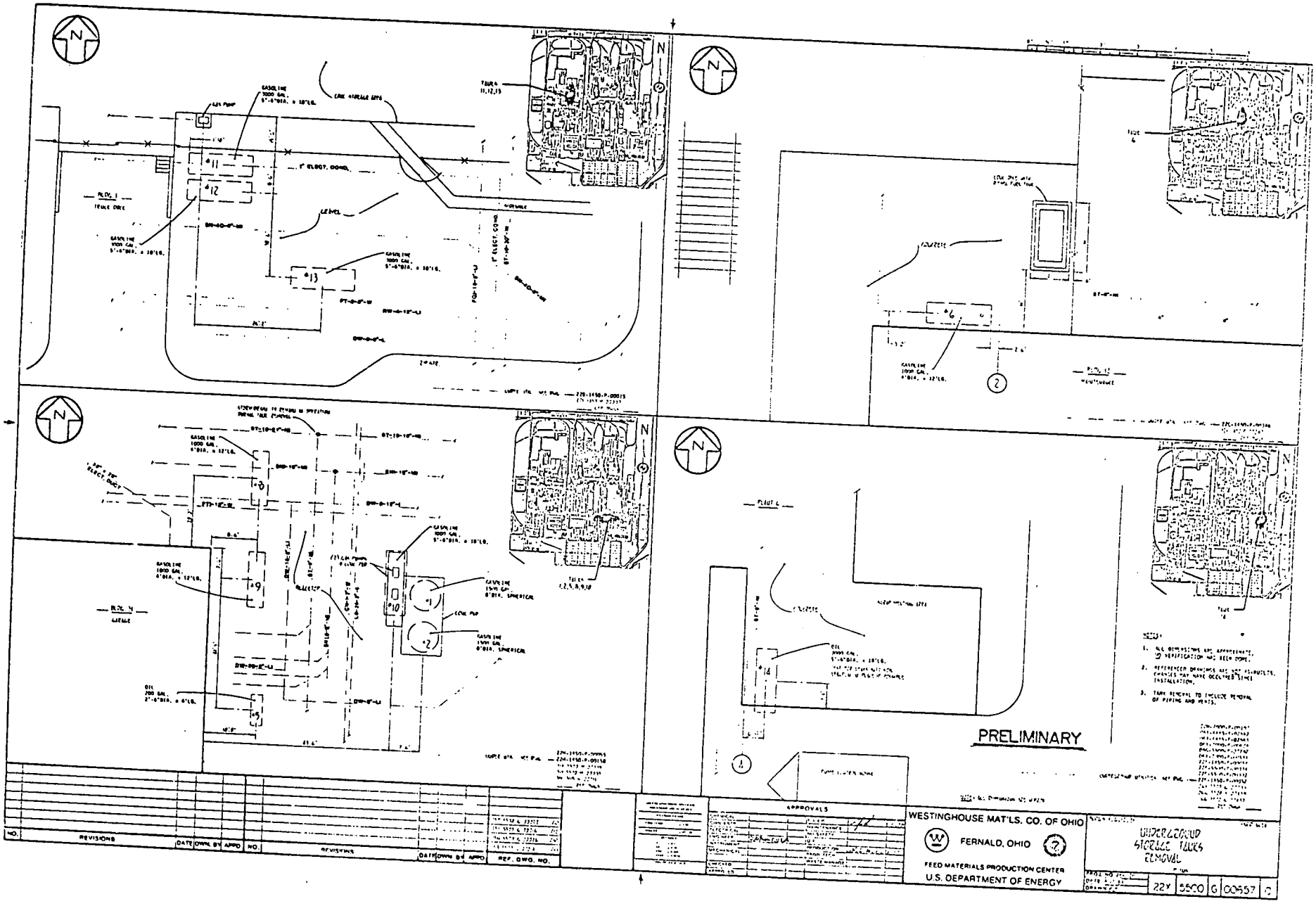
Appropriateness of a Response

If it is determined that a response is appropriate due to the potential for contaminants to migrate, a removal action to address the existing contamination and to mitigate the possibility of release to the environment should be undertaken.

If a planning period of less than six months exists prior to initiation of a response, DOE will prepare an Action Memorandum. The Action Memorandum will describe the selected response and supporting documentation for the decision.

FMPC Underground Storage Tank
Closure Status Report - 4/6/90

Tank No.	Capacity gals.	Product	Construction	Age yrs.	Location	Future Status	Closure Start Date	Remarks
1	1500	Gasoline	Fiberglass	8	Garage	Remove	by 9/90	
2	1500	Gasoline	Fiberglass	8	Garage	Remove	by 9/90	
6	1000	Gasoline	Steel	36	Maintenance Bldg. 12	Remove	by 9/90	Tank appears to be filled with sand
8	1000	Gasoline	Steel	36	Garage	Remove	by 9/90	
9	1000	Gasoline	Steel	36	Garage	Remove	by 9/90	
10	3000	Gasoline	Steel	36	Garage	Remove	by 9/90	
11	3000	Gasoline/ Kerosene	Steel	36	Plant 1 Truck Dock	Remove	5/90	
12	2000	Gasoline	Steel	36	Plant 1 Truck Dock	Remove	5/90	
13	3000	Gasoline	Steel	36	Plant 1 Truck Dock	Remove	5/90	
14	3000	Soluble Oil	Steel	26	Plant 6 Bldg. 70	Abandon in place	by 9/90	



Note: This copy of the original document is included for information only. A copy of a larger scale was provided with the original document. Large scale copies may be obtained from J. Eckstein at Extension 6404.