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**OHIO EPA COMMENTS ON FMPC REVISION I
WORK PLAN AND CHANGE PAGES TO THE
FMPC RI/FS PLANS**

11/06/87

OEPA/DOE-FMPC

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~~LETTER~~

Comment



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 [Handwritten notes and stamps including "K.C.", "Top Gun Cleaner Environment 15 Year Anniversary 1972-1987"]

Richard F. Celeste
 Governor

November 6, 1987

Mr. Rick Collier
 DOE - FMPC
 P.O. Box 398705
 Cincinnati, OH 45239

Dear Mr. Collier:

Enclosed please find OEPA's comments on the revised work plan and other documents received on September 15, 1987. If you have any questions please contact me.

Sincerely,

Graham E. Mitchell

Graham E. Mitchell
 Supervisor
 Water Quality Monitoring and Assessment

GEM/lal

cc: Ms. Catherine McCord, USEPA
 Mr. Bill Franz, USEPA

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OHIO EPA
COMMENTS ON FMPC REVISION I WORK PLAN

1. General Comment: Section 1 of the revised work plan is not paginated.
2. Section 1.3: The agreed upon revision was not correctly made in the second bullet item. Specifically, the word "components" was not deleted from the second line. As it stands, the line makes no sense.
3. Section 1.4, second paragraph (and Page 2 of 2 in the QAPP): The text here does imply that FMPC recommends remedial action alternatives. Stating that the FS performs this task leaves one wondering who is performing the FS. According to what is believed to be current USEPA policy, the FS stops after presenting a detailed analysis of alternatives. The alternative which best meets SARA requirements for selection of remedy should stand out above the others presented in the FS, but a specific recommendation should not be made by DOE in the FS report.
4. Section 2.1.3.2, page 2-7: The last sentence on this page, aside from containing two typographical errors, fails to mention that the "third well" (Knollman/Crawford) was historically used for drinking water purposes. ^{third paragraph}
~~implies that the shallow 100-series will be sampled first.~~
5. Section 2.2.1, page 2-13: The third sentence in the second paragraph incorrectly says settleable solids were removed from waste streams in "Plant 5" by clarification. In the last sentence, the word "February" was deleted before the year "1987".
6. Section 2.5.5, page 2-36: The second to last paragraph still does not answer OEPA's question concerning whether or not the uranium-contaminated private water supply well south of the FMPC can still be accessed for drinking water.
7. Section 2.6.3, page 2-37: The first sentence should read: Potential health impacts . . . have six principal components". The fifth bullet should include consideration of potential health impacts from ingesting water from new and existing wells.

8. Section 3.1, page 3-4: It is not understood how the no-action alternative can be used to provide a comparative baseline for assessing the relative cost-effectiveness of other remedial action alternatives. If no-action is taken, then obviously the cost is "zero". The sole purpose for considering the no-action alternative is from the standpoint of environmental and public health evaluation. As this section of the text has been "revised", it is very contradictory.
9. Section 4.2.1.3, page 4-20: The second bullet item should read as follows: Determine the concentrations and sources of contaminants on-site as well as the concentrations of contaminants which have migrated off-site from on-site sources.
10. Figure 4.5, page 4-23: The location of proposed well #175 is not labeled.
11. Figure 4.6, page 4-24: General ground water flow directions were left off of this figure.
12. Figure 4.7, page 4-25: Explain why wells 203 and 205 on Figure 3.4 of the original work plan are now designated as 300-series wells (303 and 305) in the revised work plan.
13. Table 4.2, page 4-28: Well 205 or 305, whichever the case may be, is not listed on this table.
14. Section 4.2.1.3, page 4-30: The third paragraph implies that the shallow 100-series will be sampled first before any deeper wells are installed. Is this in fact what is being proposed? This seems to contradict what is stated in the third paragraph of page 4-33 which states that sampling will not be performed until all wells are installed. It is OEPA's understanding that the deep well of a cluster will be drilled first in order to determine the thickness of the till and thus aid in locating the screened interval for the 100-series wells. This appears to be at odds with what is contained in the text, namely, that shallow wells will be installed first ". . . before advancing the corresponding deeper holes into the sand and gravel aquifer below."
15. Section 4.2.1.3, page 4-34, last bullet item: This statement is arguable since base/neutral and acid extractable compounds were not analyzed for under the RCRA program and have been found to exist in the waste pit area. Further, HSL pesticides and PCBs were also not part of the RCRA program but some of these compounds have been detected in the waste pit areas.

16. Section 4.2.1.3, page 4-34, last paragraph: See comment #11 regarding pesticides. HSL pesticides and PCBs must be included in the analytical program for monitoring wells. The number of wells proposed to be sampled for HSL organics and inorganics (13) is grossly inadequate and will not necessarily confirm conditions found under the RCRA monitoring program because of the limited parameters that were analyzed for, and because site monitoring well coverage, especially in the waste pit area has been poor.
17. Section 4.2.1.3, page 4-35, last paragraph: The absence of a compound from the results of the CIS program is not sufficient of a reason on which to base the selection of analytical parameters or the sampling of downgradient monitoring wells.
18. Section 4.2.1.4, page 4-35, second bullet: "Hazardous chemical" should be changed to "hazardous substance".
19. Section 4.2.1.4, page 4-36, third paragraph: The last sentence states that CIS samples were composited for physical and chemical analysis. Was this the case for those samples that were to be analyzed for volatiles? Also sediments in the clearwell, if not sampled as part of the CIS, must be sampled for full CLP list parameters.
20. Section 4.2.1.5, page 4-39, second bullet: "Hazardous chemical constituents" should be changed to "hazardous substances".
21. Section 4.2.1.5, page 4-40: The first paragraph should specify Ohio EPA Director's Findings and Orders and should give the effective date of those orders.
22. Table 4.3, page 4-42, second bullet: Any seeps that are identified as coming from the waste pit area must have both the seep water and sediment sampled for HSL organics and inorganics (including pesticides and PCBs).
23. Section 4.2.1.5, page 4-43, first full paragraph: The stated reference to Figure 4.4 should be to Figure 4.9.
24. Figure 4.9, page 4-45: What was the reason for deleting sampling locations SW-1 and SW-2 (Figure 4.6 of the old work plan) from the revised work plan?
25. Section 4.2.1.5, page 4-48, second to last bullet: Water and sediment samples taken from identified seeps as proposed on Table 4.3 must be analyzed for complete HSL parameters.

26. Section 4.2.1.6; page 4-49, first 2 bullets: What does "contaminant substance release" mean?
27. Section 4.3.1, page 4-58: The first sentence is poorly written and should be clarified.
28. Section 4.4.1, page 4-77, first paragraph: The endangerment assessment must also be performed consistent with the USEPA document titled: Superfund Public Health Evaluation Manual (EPA/540/1-86/060, October, 1986).
29. Section 4.4.4.2, page 4-79, first paragraph: The use of the term "contaminants of concern" is more appropriate here rather than "indicator partameters" or "indicator chemicals" and ensures consistency with the usage of that term in preceeding pages.
30. Section 4.4.4.2, page 4-79, second paragraph: The acronyms ICRP and NCRP should be spelled out the first time they are used in the text.
31. Section 4.4.4.4, page 4-81, second paragraph: The term "contaminant of concern" should be used instead of "indicator chemical."
32. Section 5.5, pages 5-4 and 5-5, last bullet: It should be stated here what the context for meeting the Groundwater Protection Standards is, i.e., these are RCRA standards found in 40 CFR 264.92 and apply to hazardous constituents entering the ground water from a regulated unit.
33. General comment: Many of the figures duplicated in this revision are of extremely poor quality and are impossible to read. They should be replaced.

COMMENTS ON CHANGE PAGES TO FMPC RI/FS PLANS

1. Page 10, Section 3.3.1: The third sentence of the proposed language does not make any sense.
2. Page 25, proposed Table 3.2: Under the holding time column, what does 10/40 mean? Shouldn't this be 5/40 to be consistent with footnote "a"?
3. Page 26, Section 3.10 proposed language: The proposed number of wells to be sampled and analyzed for complete HSL parameters (16 out of total of 143) is grossly inadequate. The proposal will not adequately determine the nature or the vertical or horizontal extent of ground-water contamination. Monitoring under the RCRA program left data gaps in the waste pit area both in terms of the areal distribution of data points (i.e., monitoring wells) and analytical parameters (no BNAs, PCBs, and only a few pesticides were analyzed for). Wells in the vicinity of the waste pits which should undergo analysis for complete HSL parameters in addition to those proposed by DOE include: 104, 110, 119, 121, 125, 172, 173, 174, 175, 176, 178 and 183. Well 116, located south of fly ash pile no. 1 should also be sampled for complete HSL parameters.

In addition to the 200-series wells proposed by DOE to be sampled for complete HSL parameters, the following wells should also be sampled for the same HSL parameters: 214, 215, 216, 219, 220, 221 and 222. These wells will provide better coverage in the waste pit area; HSL analysis on wells 214, 215 and 220 will confirm the presence of several VOCs which were detected in these wells during previous RCRA sampling. Other wells in which significant levels of acetone, 2-propanol, and butanol were detected during previous RCRA monitoring may also need to undergo HSL analysis if documentation cannot be provided to indicate whether or not the presence of these compounds in the samples is the result of poor equipment decontamination or other short comings in sampling procedures.

4. Page 30.e, Proposed Table 5.1: See Revised Work Plan comment #22.
5. Page 37, Section 6.3.6, proposed language: State which CLP parameters may be expected to be bioaccumulators in the biological samples and would therefore be analyzed for.

ADDITIONAL COMMENTS

1. Page 2-21: Section 2.3.4 The production area should be included as a potential source of contamination since spills/leaks may migrate into the ground water via floor drains/cracks. The preliminary investigation could take place in the underground storage tank inspections.
2. Page 2-32: Section 2.4.4 Continuity of the "Blue Clay" stratum beneath FMPC has not been well defined with respect to a complete separation of the upper and lower aquifers. The possibility that contaminants in the upper aquifer could migrate to the lower can not be discounted at this time.
3. Page 4-30: Section 4.2.1.3 Groundwater Sampling Plan.
 - a. Monitoring wells should be placed in the production area to identify any contaminant sources.
 - b. Need to include ammonia and TKN in groundwater parameter coverage.
4. Response to Ohio EPA comments page 6-2 - Comment #5. During the technical exchange sessions (3-17-87) it was pointed out that Pit #1 was used as a clearwell for liquid wastes after Pit #2 was constructed. Effluent from Pit #1 was then pumped to the Great Miami River.