

971

LEAD RELEASE AT THE FMPC

08/31/89

DOE-1540-89

DOE-FMPC/WMCO

2

LETTER



Department of Energy

FMPC Site Office
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6319

971

August 31, 1989
DOE-1540-89

President
Westinghouse Materials Company
of Ohio
P. O. Box 398704
Cincinnati, Ohio 45239-8704

Dear Sir:

LEAD RELEASE AT THE FMPC

Reference: Letter, WMCO:R:89-215, W. A. Weinreich to J. A. Reafsnyder "Lead Release at the FMPC", dated August 4, 1989

Review was conducted on the letter referenced above. The transmittal is to satisfy the requirements of 40 CFR 300.64 for a preliminary assessment of the release of lead contaminated material at the FMPC in determining whether a removal action as described in 40 CFR 300.65 is required. The information provided in this transmittal is unsuitable for making this determination.

Specifically, the following comments justify that the information provided in the reference is incomplete.

- 1) In the fourth paragraph, it does not state the date of notification to the regulatory agencies for the release, the quantity of the release and the impact area.
- 2) In the fifth paragraph, it indicates that a program of cleanup to remove this lead contamination was initiated in accordance with the referenced "Grit Blast Material Clean Up Plan". A copy of this WMCO document is not included as an appendix to this report as it states.
- 3) In the sixth paragraph, it is unclear what type of contamination was removed from the trench and when it was completed. Furthermore, in the same paragraph, it indicates that four samples were collected from four locations. It does not disclose the exact locations of these samples, sampling methods and analytical results. The information is needed to determine whether any on-site and/or off-site contamination should be a concern.

- 4) The EP toxicity cannot be used as the "clean" levels for soil. Ohio EPA uses two alternative standards for naturally occurring elements or compounds for hazardous waste closures. The same standards should also be applicable for the CERCLA related clean up. These two alternatives are described as follows:

Alternative A - Soils shall be considered to be contaminated if concentrations in the soils exceed the mean of the background samples plus two standard deviations. All metals analyses must be for total metals.

Alternative B - Soils shall be considered contaminated if concentrations in the soils exceed the upper limit of the range for Ohio farm soils. For lead, this range is 9 to 39 ug/g. Again, the metal analysis must be for total metals.

Please revise your transmittal accordingly and return to my office by September 15, 1989.

If you have any questions please contact Jack Craig of my staff at extension 6159.

Sincerely,



J. A. Reafsnyder
FMPC Site Manager

DP-84:Craig

cc:

L. J. Sparks, DOE/ORO
M. J. Galper, WMCO
S. G. Schneider, WMCO