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**CONDITIONAL APPROVAL REVISED WASTE PIT
STORMWATER REMOVAL**

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State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

April 2, 1991

Re: CONDITIONAL APPROVAL
REVISED WASTE PIT
STORMWATER REMOVAL

Mr. Jack Craig
U.S. DOE FMPC
P.O. Box 398705
Cincinnati, Ohio 45239

Dear Mr. Craig:

This letter will serve as conditional approval of the Revised Waste Pit Area Stormwater Runoff Control ~~Removal~~ Action Work Plan. The conditions for approval are that the comments listed below are addressed to Ohio EPA's satisfaction.

General Comments

1. Some of DOE's responses to Ohio EPA comments state that changes will be made to the work plan, yet no revised work plan or replacement pages are attached. DOE has previously stated in its response to comments on other documents that changes were made in a document, when in actuality they weren't. DOE should include with the response to comments either a revised work plan or replacement pages for changes that are made. Either of these methods is acceptable to Ohio EPA.

Specific Changes

1. Revised SAP, Section 1.0, Page One, Pre-Excavation Soil Sampling: VOCs readily volatilize from surface soil and most likely would not be found in the first six inches of soil. Since greater than six inches of soil will be removed, initial characterization VOC samples should be collected at the 18 to 24 inch range. DOE should remove soil at six inch increments to a depth of 24 inches. Each increment should be field scanned with an HNu. VOC samples should be collected from the increment with the highest HNu reading. If no increment has an above background HNu reading, VOC samples should be collected from the bottom six inches.
2. Revised SAP, Section 1.0, Page Two, First Paragraph: DOE should include in the SAP the laboratory quantitation limits being used to determine excavation requirements for non-naturally occurring HSLs.
3. Revised SAP, Section 1.0, Page Two, Second Paragraph: DOE should use data from background sampling conducted under the RI/FS for naturally occurring HSLs. The article "Background Levels of Heavy Metals in Ohio Farm Soils"

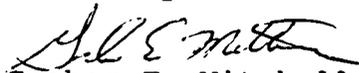
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(T. Logan and R. Miller, Feb. 1983, Ohio State University OARDC Research Circular 275) should be used in determining background levels for heavy metals, if site specific background levels are not available. The use of a state study to determine background levels is more appropriate than the use of a national study, when specific sampling is not being conducted to determine true background.

4. Revised SAP, Section 1.0, Page Two, Second Paragraph: It is assumed the "contaminants of concern" discussed in this section are those which are detected above quantitation limits or background levels, whichever is appropriate. If this is not the meaning of "contaminants of concern", additional clarity must be added to the paragraph.
5. Revised SAP, Section 1.0, Page Two, Second Paragraph: The use of previous EP Toxicity data to determine leachability and containerization requirements is inappropriate since the TCLP has been promulgated. Unless TCLP analysis is to be conducted, those soils exhibiting above background concentrations of HSLs should be containerized until such time as their hazardous waste status can be determined.
6. Revised SAP, Section 1.0, Page Two, Last Paragraph: Compositing VOC soil samples is not a preferred method of sample collection. DOE should collect grab VOC samples from the four locations within each grid. This method allows compositing samples other than VOC and yield 32 VOC samples.
7. Suggestion; Alarm Setting in the Pump Station: DOE may want to reconsider the alarm setting on the pumps. If the fourth pump is considered backup, DOE may want the alarm to sound when the third pump comes on to allow more warning. Also, important in this decision is how often the third pump is expected to operate.

If you have any questions please contact me.

Sincerely,


Graham E. Mitchell
DOE Coordinator

GEM/acn

cc: Kathy Davidson, OEPA/CO
Jack Van Kley, AGO
Catherine McCord, U.S. EPA
Lisa August, GeoTrans Inc.
Ed Schuessler, PRC Inc.