

R-012-207.4

1100

**CONDITIONAL APPROVAL PLANT 1 PAD
REMOVAL**

04-03-91

**OPEA/DOE-FMPC
3
LETTER**



State of Ohio Environmental Protection Agency

Southwest District Office

40 South Main Street
Dayton, Ohio 45402-2086
(513) 285-6357
FAX (513) 285-6249

1100

George V. Voinovich
Governor

April 3, 1991

RE: CONDITIONAL APPROVAL
PLANT 1 PAD 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 for the Plant 1 Pad Removal Action Work Plan. The conditions for this approval are that DOE address, to Ohio EPA's satisfaction, the comments listed below.

General Comments

1. Several 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 Comments

1. Response to OEPA Comment 2: DOE should provide more complete references when citing a document within a response {i.e., "(DOE, 1988)" and "(ICRP)"}. A more complete reference will allow the reader to independently review information summarized in the response.
2. Response to OEPA Comment 2: The risk coefficient quoted in the paragraph text is " 2×10^{-4} ", while that used in the equation is " 2×10^{-7} ". DOE should correct this discrepancy.
3. Revised SAP, Section 8.0, Page 19, Last Paragraph: 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.

Mr. Jack Craig
April 3, 1991
Page 2

If no increment has an above background HNu reading, VOC samples should be collected from the bottom six inches.

Figure 2-2 is not present in Attachment 2. The location of the referenced figure should be clarified.

4. Revised SAP, Section 8.0, Page 20, 1st paragraph: DOE should include in the SAP the laboratory quantitation limits being used to determine excavation requirements for non-naturally occurring HSLs.
5. Revised SAP, Section 8.0, Page 20, 2nd 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" (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.
6. Revised SAP, Section 8.0, Page 20, 2nd Paragraph; The use of previous EP Toxicity data to determine leachability and containerization requirements is inappropriate since TCLP has been promulgated. Unless TCLP analysis is to be conducted, those soils exhibiting above background concentrations should be containerized until such time as their hazardous waste status can be determined.
7. Revised SAP, Section 8.0, Page 21, 1st Paragraph: DOE should provide justification for analyzing only 10% of the post-construction sampling locations for full HSL analysis. This seems to be a rather insignificant sampling effort and probably does not provide a representative view.
8. Revised SAP, Section 8.0, Page 21, 1st Paragraph: Compositing VOC soil samples is not a preferred method of sample collection. Since only 12 of the 120 grids will be analyzed for the full HSL, DOE should consider collecting grab VOC samples from the four locations within each grid. This method allows compositing samples other than VOC and yields 48 VOC samples. Since the holding time for VOCs is only 14 days, archived VOC samples will be of little use and not required for the other 108 grids.

Mr. Jack Craig
April 3, 1991
Page 3

If you have any questions please contact me.

Sincerely,



Graham E. Mitchell
DOE Coordinator

GEM/bjb

cc: Kathy Davidson, OEPA
Jack Van Kley, Ohio AG
Catherine McCord, U.S. EPA
Robert Owen, ODH
Lisa August, Geotrans
Ed Schuessler, PRC