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**CONDITIONAL APPROVAL WASTE PIT AREA RUN
OFF REMOVAL ACTION WORK PLAN**

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State of Ohio Environmental Protection Agency

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January 11, 1991

Re: **CONDITIONAL APPROVAL
WASTE PIT AREA
RUN OFF REMOVAL
ACTION WORK PLAN**

Mr. Andrew Avel
U.S. DOE-FMPC
P.O. Box 398705
Cincinnati, Ohio 45239

E-1286

Dear Mr. Avel:

The purpose of this letter is to conditionally approve the Revised Waste Pit Area Storm Water Runoff Control Removal Action Work Plan. The conditions for approval are that DOE address, to the Ohio EPA's satisfaction, the issues listed below:

Work Plan Specific Comments

1. Page 6, 3.1.a: Information to be provided to U.S. EPA under this section, such as preliminary operations and maintenance manual discussion etc., should also be made available to Ohio EPA for review.
2. Page 7, 4.0, first paragraph: A statement concerning the fact that contaminated stormwater will continue to flow to Paddy's Run from Drainage Area A should be incorporated into this section. The paragraph gives the impression that only non-contaminated storm water will flow to Paddy's Run following the removal action. The fact that contaminated runoff will continue to Paddy's Run is revealed in DOE's response to Ohio EPA's EE/CA Comment 1 included in this revision of the work plan.
3. Drawing C-1: A legend must be included with this drawing in order to enable the reader to interpret the information provided in it.

Sampling and Analysis Plan Specific Comments

1. Page 2, 2.0, first paragraph: The data discussed in this section should be provided so as to support DOE's conclusion that the soils in the proposed construction area are non (RCRA) hazardous. This information is also necessary to better understand the working environment and potential risks to workers during the removal action.

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2. Page 2, 2.0, second paragraph: Thorium and Radium are not considered in the build-over criteria considered here. Both of these are contaminants within the waste pit area and should be considered when determining build-over criteria. This removal action may impair the implementation of final remediation if a cleanup level of less 35pCi/gm of total uranium is determined and a structure vital to the removal action is placed over soils above the final remediation cleanup level.
3. Page 3, second paragraph: DOE should provide justification for sampling only 10% of the locations for full HSL analysis. This seems to be a rather insignificant sampling effort and probably does not provide a representative view.
4. Page 4, 3.0, second paragraph: DOE should stipulate whether the 35pCi/gm discussed in this paragraph is solely for total uranium or includes all radioisotopes. If all radioisotopes are not included, what values will determine criteria for other radioactive contaminants such as thorium, radium, cesium, etc.?
5. Page 4, 3.0, fifth paragraph: It appears from section 3 that soils which are not stockpiled or packaged as low level waste (i.e. soils <35pCi/gm) will not be analyzed for TCLP. DOE should consider conducting TCLP on a representative samples of soils, which are excavated and then used as backfill somewhere else, in order to assure that hazardous substances are not being used.

If you have any questions about these conditions please contact me.

Sincerely,



Graham E. Mitchell
DOE Coordinator

GEM/acp

cc: Tom Winston
Jack Van Kley
Catherine McCord
Robert Owen
Lisa August