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**CONDITIONAL APPROVAL SOUTH PLUME
REMOVAL WORK PLAN**

04/12/91

OEPA/DOE-FMPC

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LETTER

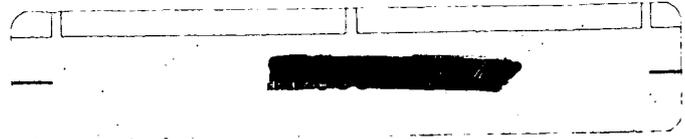
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State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich
Governor

April 12, 1991

Re: **CONDITIONAL APPROVAL
SOUTH PLUME REMOVAL
WORK PLAN**

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 Work Plan for the South Groundwater Contamination Plume Removal Action, Part 2 and Part 3. The condition of approval is that DOE address to Ohio EPA's satisfaction the comments listed below.

1. Page 11: will the 8000 GPM new outfall line capacity be reduced during high river conditions? If so, how much will it be reduced?
2. In order to evaluate substantive compliance with ARAR's, Ohio EPA will need to review and comment on plans for the new final outfall line. When will these plans, and specifications be submitted?
3. Section 5.2, Page 12: Discharge parameters such as iron, manganese, pH (6.5-9.0), dissolved oxygen (min. 5.0 mg/l) and total suspended solids will most likely have limits and not just be monitored. DOE was to check into the dissolved oxygen concentration in the South Plume Groundwater to see if meeting a 5.0 mg/l minimum would be a problem. Also, where is the oil and grease coming from in the South Plume and IAWWT.
4. Section 5.2: Actual monitoring frequencies for outfalls 003, 607, and 608 will be determined during the NPDES Permit Modification Process.
5. Section 5.2, Page 13, 1st Paragraph: The removal of "alpha and beta radiation and" from the first sentence in this paragraph is inconsistent with Table 1. DOE should provide justification for the removal of alpha and beta radiation measurements from the work plan.

*partial
action
response
to u-1017
(2583)*

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6. Section 5.2, Page 13, 1st Paragraph: DOE should consider limited measurements total rads for monitoring points 607 and 608. A few sets of measurements for total rads will allow a look at the efficiency of the IAWTT at removing radionuclides other than uranium from the wastewater.
7. Attachment II: Page numbers should be included for this Attachment.
8. Attachment II, Section 2: This Section of the SAP fails to address any suspect areas associated with the new outfall line. The SAP in general fails to look at the work to be conducted while installing the new outfall line. Suspect areas must be associated with this installation since the old line is suspected of leaking and a tie into this line is required. DOE must address potential contamination of soils associated with the new outfall portion of the removal action in this section of the SAP. DOE should incorporate data from the outfall line and manhole #180 investigations.
9. Attachment II, Section 2, 1st Page. Next to Last Paragraph: A figure should be included detailing proposed sampling locations, extent of the suspect area, and the area to be excavated.
10. Attachment II, Section 2, 1st Page, Next to 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. If no increment has an above background HNu reading, VOC samples should be collected from the bottom six inches.
11. Attachment II, Section 2, 2nd Page, 1st Paragraph: DOE should include, in the SAP the laboratory quantitation limits being used to determine excavation requirements for non-naturally occurring HSLs.
12. Attachment II, Section 2, 2nd page, 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

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- 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.
13. Attachment II, Section 2, 2nd Page, 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.
 14. Attachment II, Section 3.2, 3rd page, 3rd Paragraph: The first sentence of this paragraph is missing a word and should be edited. Depending on the location chosen for the transfer pump station, contaminated soil may be encountered as a result of local industrial activities. DOE may need to conduct some pre-excavation sampling in this location in order to characterize soils which are to be removed.
 15. The operation and maintenance manual for the South Plume Removal should be submitted to Ohio EPA for review and comment by September 1, 1991.

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

Sincerely,



Graham E. Mitchell
DOE Coordinator

GEM/mlf

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