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**PETROLEUM UNDERGROUND STORAGE
TANKS**

05-24-1991

DOE-FSO/EPA

DOE-1407-91

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LETTER



Department of Energy

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

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MAY 24 1991

DOE-1407-91

Ms. Catherine A. McCord, Remedial Project Manager
U. S. Environmental Protection Agency
Region V, 5HR - 12
230 South Dearborn Street
Chicago, Illinois 60604

Mr. Graham E. Mitchell, DOE Coordinator
Ohio Environmental Protection Agency
Southwest District Office
40 South Main Street
Dayton, Ohio 45402

Dear Ms. McCord and Mr. Mitchell:

PETROLEUM UNDERGROUND STORAGE TANKS

Reference: Letter, T. Forbes (Ohio Department of Commerce, Bureau of Underground Storage Tank Regulations) to K. Brakken, "Incident Nos. 319817-01 through 04," dated April 1, 1991

The referenced letter requested the performance and submittal of a Site Assessment for the characterization of petroleum releases at former tank sites in accordance with Ohio Underground Storage Tank (UST) regulations. The required Site Assessment is in reference to seven excavations resulting from the removal of ten UST's in 1990. The purpose of this letter is to provide our plan of action to satisfy the intent of Ohio UST requirements, while integrating the requirements of the ongoing sitewide Feed Materials Production Center (FMPC) Remedial Investigation/Feasibility Study (RI/FS).

Our proposed plan calls for the execution of the following activities in pursuit of compliance with all applicable requirements:

1. Characterization of accumulated water - Samples will be taken from the water which has accumulated within the excavations and from the sediments below. These samples will be analyzed for the full spectrum Toxicity Characteristic (as defined by 40 CFR 261.24) plus any potential hazardous contaminants which may have migrated from nearby sources as determined on a location specific basis.
2. Disposition of water - On the basis of the completed characterization, the water will be removed from the excavations and stored or disposed of in accordance with all applicable

regulations. Preliminary results indicate the water can be handled through the existing site water treatment system.

3. Excavation - A photo-ionization detector (PID) will be used to guide further excavation in an attempt to remove contaminated soils resulting from the petroleum releases. Excavation will proceed until soil vapor levels reach background as determined by the PID.
4. Certification sampling - After background vapor levels are achieved, certification samples will be collected from the base of the excavation in accordance with RI/FS QAPP protocols. The samples will then be split and analyzed as follows:
 - a. Standard UST Analyses
 Total Petroleum Hydrocarbons (TPH)
 Benzene, Toluene, Ethyl Benzene, Xylene (BTEX)
 Total Lead

 (These analyses will be performed on an expedited basis with results expected in 14 days.)
 - b. Standard RI/FS QAPP Analyses

 Full Radiological Parameters
 Full Hazardous Substance List

 (These analyses will be performed utilizing a RI/FS QAPP laboratory with results expected in 90 days.)
5. Evaluate Data - If the results of the standard UST analyses indicate contaminant levels above the verbal limits formerly conveyed by the State Fire Marshal, further dewatering, excavation, and certification sampling will be performed¹. If the results of the standard UST analyses are below the limits, a report will be prepared and transmitted to the State Fire Marshal requesting approval of a clean closure. A copy of this report will be forwarded to your office.

¹ The Ohio State Fire Marshal's office has indicated cleanup limits verbally as follows:

<u>Parameter (Method)</u>	<u>Contaminant Level (ppm)</u>
Total Petroleum Hydrocarbons (USEPA SW 846, Method 9071 and USEPA 600/4-74-020, Method 418.1)	40
Benzene, Tolunene, Ethyl Benzene, Xylene (USEPA SW 846, Method 8020)	detectible
Total Lead (USEPA SW 846, Method 7420)	100

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ACTIVITY ID	ORIG DUR	REM DUR	TOTL FLT	EARLY START	EARLY FINISH
R08010	10	1	156	14MAY91A	22MAY91
R08020	24	20	137	20MAY91A	19JUN91
R08030	5	4	0	22MAY91A	28MAY91
R08040	0	0	0	28MAY91	
R08050	25	25	0	28MAY91	1JUL91
R08060	70	70	0	2JUL91	9OCT91
R08070	75	75	15	9JUL91	22OCT91
R08080	125	125	0	9JUL91	8JAN92
R08090	67	67	15	2AUG91	5NOV91
R08110	67	67	15	16AUG91	20NOV91
R08130	67	67	15	30AUG91	6DEC91
R08140	52	52	15	30SEP91	13DEC91

1991												1992
APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR
Sample Water & Sediment												
Analyze Water & Sediment												
DOE Reviews Revised Plan												
DOE Approves Revised Plan												
ASI Mobilization												
Dewatering, Excavating & Sampling												
Analyze Soils - State Fire Marshall												
Analyze Soils-Remedial Invest/Feasibility Study												
Prepare & Submit SEM Reports to DOE												
DOE Review/Submit Reports to State Fire Marshal												
State Fire Marshall Review & Approve Reports												
Backfilling of Excavations												

Activity 0 scale to Date
 Critical Path by
 Program Bar

Procon Systems, Inc. 1984-1991

Project Start: 11JAN90
 Project Finish: 8JAN92

WMCO
 TASK 8 LEVEL 3
 BARCHARTS LEVEL III

Sheet 1 of 1

Date Drawn: 22MAY91
 Plot Date: 22MAY91

Date	Revision	Checked	Approved

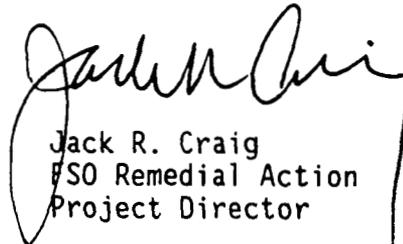
6. Fire Marshal Response - If the request for clean closure is granted, the excavations will be backfilled and a final report will be generated for the Administrative Record incorporating all of the RI/FS QAPP analytical data into the RI/FS data base for FMPC Operable Unit 5. If the request for clean closure is denied, it will be necessary to determine whether additional excavation is warranted. If it is warranted, item nos. 2 through 5 above will be repeated. If further excavation is not warranted, we may propose to the Fire Marshal that further cleanup proceed as a part of the final CERCLA action.

The selection of this approach is based upon the known physical characteristics of the clay-rich glacial overburden underlying the production area at the FMPC. It is believed that the proposed excavation program will allow the removal of all of the petroleum contaminants and that the analytical data from the soil will provide the necessary justification for a clean closure under Ohio underground storage tank regulations.

A schedule for this proposed course of action is enclosed.

If there are any questions, please contact Robert Janke at (513) 738-6883.

Sincerely,



Jack R. Craig
FSO Remedial Action
Project Director

FSO:Brakken

Enclosure: As stated

cc w/encl.:

K. A. Hayes, EM-424, GTN
P. J. Gross, SE-31, ORO
E. Phillips, SE-31, ORO
S. W. Coyle, WMCO
E. D. Savage, WMCO
R. S. Shirley, WMCO
T. Forbes, Ohio BUSTR
AR File

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C Allen Neill

file USTs