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RESPONSE TO OHIO EPA COMMENTS

XX-XX-XX

RESPONSE TO OHIO EPA COMMENTSGENERAL COMMENT

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.

RESPONSE

A revised sampling and analysis plan is attached to this document. This revised Plan replaces the Plan transmitted to U.S. EPA and OEPA as Attachment A in Letter, DOE-887-91, J. R. Craig to C. A. McCord and G. E. Mitchell, "Waste Pit Area Stormwater Run-off Control Removal Action," dated March 5, 1991.

Provided with this document as Attachment 5, is a revised Waste Pit Area Stormwater Run-off Control Removal Action Work Plan, dated May 3, 1991. This revised Work Plan includes modifications to Section 4.0, Field Actions and was inadvertently not attached to the response to OEPA comments DOE-887-91, dated March 5, 1991.

The attached revised Waste Pit Area Stormwater Run-off Control Removal Action Work Plan replaces Work Plans previously issued.

RESOLUTION

See Attachments 3 and 5.

SPECIFIC CHANGE 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 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.

RESPONSE

Agreed.

RESOLUTION

See Attachment 3, Page 2, Seventh Paragraph

SPECIFIC CHANGE 2

Revised SAP, Section 1.0, Page Two, First Paragraph: DOE should include in the SAP the laboratory quantification limits being used to determine excavation requirements for non-naturally occurring HSLs.

RESPONSE

Agreed

RESOLUTION

See Attachment 3, Appendix B

SPECIFIC CHANGE 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." (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.

RESPONSE

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) presents data for six metals only. This study was performed to assess the impacts of applying municipal sewage sludge to farm soils. The purpose of this study was to establish background levels of metals in soils not previously treated with municipal sewage sludge; not to establish true background levels. Therefore, the data generated from this study does not necessarily represent true background levels. The soils sampled as part of this study may have become contaminated with metals due to their proximity to heavily traveled areas and industrial sites, and the possible use of phosphate fertilizers.

The article "Elemental Concentrations in Soils and Other Surficial Material of the Conterminous United States", USGS Professional Paper 1270, 1984, Shocklette, H.T., and Boerngen, J.G., presents elemental concentrations in soils for the entire conterminous United States. This study provides an indication of the approximate concentrations of elements that can be anticipated throughout the United States. However, this study does not provide an accurate data base for comparison of data from any specific location within the United States. The use of location specific elemental concentration data is required for the purposes of the subject removal action.

Appendix A of Attachment 3 to this correspondence presents data generated in support of the Manhole 180 Removal Action and the subsequent release for unrestricted use of the field to the east of FMPC owned by Knollman Farms, Inc. This data represents the most accurate and site specific quantification of background concentrations of naturally occurring HSLs available at this time. It should be noted that this data was generated from sampling and analysis performed in a manner consistent with the FMPC RI/FS Work Plan QAPP. The averages of "Samples Taken to Determine Background" in Appendix A plus three standard deviations will be considered background for naturally occurring HSLs. The average plus three standard deviations provides a value where approximately 80% of all background levels will be less than that value 90% of the time, as calculated using statistical tolerance limits.

RESOLUTION

See Attachment 3, Page 3, Third Paragraph.

SPECIFIC CHANGE 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 quantification 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.

RESPONSE

The "contaminants of concern" are those naturally occurring HSLs detected at levels above background. Additional clarity will be added to this paragraph.

RESOLUTION

See Attachment 3, Page 3, Third Paragraph.

SPECIFIC CHANGE 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.

RESPONSE

The reference to EP Toxicity analysis will be deleted.

Representative samples of containerized material will be collected to characterize the stored waste materials for purposes of determining the radiological properties of the materials and to complete a hazardous waste determination. Samples shall be collected and analyzed in a manner consistent with the protocols defined in the RI/FS QAPP and as supplemented by Part III of

SW-846, third edition, Test Methods for Evaluating Solid Waste pertaining to the sampling of containerized materials.

Collected samples shall be analyzed for full TCLP and full radiological parameters at the RI/FS QAPP laboratory. TCLP analysis shall be completed pursuant to the method specified in 55 FR 26986.

RESOLUTION

See Attachment 3, Page 5, Construction Rubble Sampling

SPECIFIC CHANGE 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.

RESPONSE

This paragraph will be deleted and replaced with a grid sampling procedure directed by random grid point selection. This paragraph now reads as follows:

"When the base elevations of the excavation for the new sump collection system are reached, a ten meter grid will be established across the excavation. Each 100 square meter area will be assigned a letter designation. Letter designations will be assigned sequentially starting with the 100 square meter area in the northwestern corner of the excavation and proceeding west to east and north to south. A two meter grid will be established in each 100 square meter area. One 0-6" core sample will be collected from each 100 square meter area at the 2 meter grid point identified in Figure 1 for that specific 100 square meter area. These soil samples will receive full radiological and HSL analysis by an FMPC RI/FS approved laboratory. Aliquots of each soil sample will receive analysis for total uranium and total thorium by the FMPC site laboratory.

RESOLUTION

See Attachment 3, Page 4, Last Paragraph.

SPECIFIC CHANGE 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.

RESPONSE

The start of pump no. 3 does not constitute an emergency condition. Pump no. 3 may operate as a function of normal operation of the pump station. We do not

believe providing an alarm which would sound upon the start of Pump no. 3 is necessary at this time. After the system is operational, modifications to the system may be made to ensure the system functions efficiently.

RESOLUTION

No action required.