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COMMENTS WASTE PIT STORM WATER
REMOVAL WORK PLAN

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State of Ohio Environmental Protection Agency

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Richard F. Celeste
Governor

November 16, 1990

RE: COMMENTS
WASTE PIT STORM WATER
REMOVAL W.P.

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

Dear Mr. Avel:

Attached are Ohio EPA's Comments on the Waste Pit Stormwater Removal Work Plan and two comments on DOE's responses to Ohio EPA's EE/CA comments.

Ohio EPA Water Pollution Control staff have reviewed the permit information summary section of this workplan and agree that it meets the substantive requirements for a Permit to Install (PTI). Ohio EPA is also aware that it is DOE's position that administrative permits are not required because the work is being conducted under CERCLA at an NPL site. However, please be advised that this work is subject to Ohio's PTI rules (OAC Chapter 3745-31-02). Upon resolution of these comments, Ohio EPA urges U.S. DOE to proceed as expeditiously as practical with work outlined in the removal work plan. Simultaneously with the start of this work DOE shall submit a PTI application to Ohio EPA.

For future response actions, an early submittal of PTI applications would eliminate possible project delays and allow DOE to meet all requirements of State Law. Ohio EPA requests that DOE do this for future response actions.

If you have any questions about these comments or permit issues please contact me.

Sincerely,

Graham E. Mitchell
DOE Coordinator

GEM/bjb

cc: Tom Winston, Ohio EPA
Jack Van Kley, Ohio AG
Cindy Hafner, Legal
Catherine McCord, USEPA
Robert Owen, ODH

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OHIO EPA COMMENTS

WASTE PIT STORM WATER REMOVAL ACTION WORK PLAN

DOE's Response to Ohio EPA EE/CA Comments

1. Comment #15: DOE's response to comment 15 states the total uranium concentrations measured at sample point 24 in Area A after 10/88 are representative of the concentrations which will continue to flow to Paddys Run from Drainage Area A after the implementation of the EE/CA. These total uranium concentrations range from 111 to 223 ug/l. This concentration will continue to leave the FMPC and provide a route of exposure to the public (via drinking water, etc.). The fact these these levels are below the DOE DCG's is insufficient justification for their continued release. The acceptability of the continued release of these levels of uranium should be evaluated based upon risk, as outlined inn USEPA's Risk Assessment Guidance for Superfund, not upon DOE's DCG's. Non-radiological contaminants which may be released via Drainage Area A should also be included in this risk analysis. Thus based upon risk, DOE needs to justify their failure to include Drainage Area A in the runoff collection system.
2. Comment 17: DOE's response to this comment refers to the tendency of stormwater runoff to infiltrate within Drainage Area G and also states that Drainage Area G will provide emergency overflow capacity for the new Collection Sump. The tendency for water to infiltrate within area G does not make it a preferred emergency overflow, since it may facilitate uranium contamination entering the groundwater. The system was designed for a 100 yr/24 hr event and overflow should be rare, but the Stormwater Retention Basins were designed for a 10 yr/24 hr event and have overflowed seven times in the four years since being put into service. Thus DOE should consider actions to minimize infiltration within Drainage Area G, if it is to be used as an emergency overflow.

Work Plan Comments

1. Page 6, second paragraph: DOE's decision to use Drainage Area G as an emergency overflow is questioned. In response to previous Ohio EPA comments DOE has suggested that stormwater runoff tends to infiltrate within area G does not make it a preferred emergency overflow, since it may facilitate uranium contamination entering the groundwater. The infiltration would also limit the efficiency of any plan to pump water out of the basin after the event occurred. Ohio EPA is unsure as to whether any permeability measurements have been conducted in this area,

but it would appear that such steps should be taken so that an estimate of the amount of water, which may infiltrate during an overflow event, can be made. The system was designed for a 100 yr /24 hr event and overflow should be rare, but the Stormwater Retention Basins were designed for a 10 yr/ 24 hr event and have overflowed seven times in the four years since being put into service. Thus DOE should also consider actions to minimize infiltration within Drainage Area G, if it is to be used as an emergency overflow.

2. Page 6 b and Schedule - Ohio EPA was under the impression that the design work for this project was virtually complete. It would seem that the 135 calendar days required for this task could be cut significantly.
3. NEPA Documentation - Waste Generated - The last sentence should state that the 26 kilograms would have previously been discharged to Paddy's Run or the Great Miami River.
4. Health and Safety Plan Page 22 12.7.1. Hospitals - If DOE has provisions for a "Life Flight" helicopter transport to a nearby hospital it should be stated in this section. If DOE does not have this arrangement set up they should consider it with the amount of remedial work planned at the site.
5. Sampling and Analysis Plan - Page 4 - Table at the top of the page - No minimum volumes are given for strontium 90 and ruthenium 106 and the maximum holding times are in the wrong columns.