

1819

COMMENTS O.U 2 ADDITIONAL SAMPLING
WORK PLAN

11-21-90

OEPA/DOE-FMPC
2
LETTER



State of Ohio Environmental Protection Agency

Southwest District Office

40 South Main Street
Dayton, Ohio 45402-2086
(513) 285-6357
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Richard F. Celeste
Governor

November 21, 1990

Re: COMMENTS 1819
O.U. 2 ADDITIONAL SAMPLING
WORK PLAN

Mr. Andrew P. Avel
U.S. DOE -2HFMPC
P.O. Box 398705
Cincinnati, Ohio 45239

Date Rec'd NOV 28 1990

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Dear Mr. Avel:

Ohio EPA has reviewed the Work Plan for Additional Sampling in O.U. 2. The plan is acceptable for all the waste areas with the exception of the sanitary landfill. The deficiencies related to this subunit are:

1. Page 1, Sanitary Landfill: The sampling proposed in this work plan fails to address concerns about the existence of waste outside the five cells of the sanitary landfill. The Initial Screening of Alternatives (ISA) for Operable Unit 2 discussed the approximately 6,000 to 8,000 cubic yards of waste, outside the cells (pg. 1-8), in an original disposal area in existence prior to construction of the celled landfill. The ISA also stated the FS was to focus only on the five cells that have been filled with waste. Ohio EPA commented that it was unacceptable to focus on the five cells and not appropriately address the additional waste area. This additional waste was probably not engineered as a sanitary landfill and would likely have a greater opportunity for leachate generation and contaminant migration. This sampling plan contains no efforts to provide further information on the waste area, since all sample locations lie outside the area of the approximate location of the original disposal area. In addition, the Western CIS sample locations appear to lie on the periphery or outside of the original disposal area when Figure 1 from this work plan and Figure 1-3 of the Op. Unit 2 ISA are compared. At least two additional borings should be located within the original disposal area, preferably within the area circumferenced by Weston CIS boreholes 1,2,4, and 5, in order to more appropriately address the wastes in this area.

Please address this comment and propose the locations for the additional borings. In the meantime work can begin in the other waste units while this issue is resolved.

Mr. Andrew P. Avel
U.S. DOE - FMPC
November 21, 1990
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If you have any comments please contact me.

Sincerely,

Michael J. Starkey for
Graham E. Mitchell
DOE Coordinator

GEM/acp

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