

**2125**

**R-009-207.24**

**SOUTH PLUME EE/CA ADDENDUM**

**09/25/91**

**OEPA/DOE-FSO**

**2**

**LETTER**

**OU5**



State of Ohio Environmental Protection Agency

Southwest District Office

40 South Main Street  
Dayton, Ohio 45402-2086  
(513) 285-6357  
FAX (513) 285-6249

2125

George V. Voinovich  
Governor

September 25, 1991

RE: SOUTH PLUME EE/CA  
ADDENDUM

Mr. Jack Craig  
Project Manager  
U.S. DOE, FEMP  
P.O. Box 398705  
Cincinnati, Ohio 45239

SEP 27 1991  
Date Rec'd \_\_\_\_\_  
Log E-4877  
File \_\_\_\_\_  
Library \_\_\_\_\_

Dear Mr. Craig:

Listed below are Ohio EPA's comments on the South Plume EE/CA addendum.

1. 1st Page, 2nd Paragraph: Since this is an addendum to a document which refers to the site as the FMPC, the addendum should discuss the name change for the facility the first time it is mentioned within the text. At present the name change is not discussed until the latter portion of the addendum and may result in some confusion to the reader.
2. 1st Page, 2nd Bullet: This secondary objective is misquoted and read ". . . .Control of plume migration to additional receptors farther south. . ." in the Final EE/CA. The objective should be rewritten to comply with the original EE/CA.
3. 1st Page, 4th Paragraph: "Cumine" is misspelled. The correct spelling is "cumene."
4. 1st Page, 4th Paragraph: This paragraph should also include some discussion of why additional treatment to remove the Paddys Run Road Site (PRRS) contaminants could not be included as a part of this portion of the removal action.
5. 2nd Page, 2nd Paragraph: This paragraph as well as the document fails to address the fact that the removal action as discussed in this addendum will not achieve the secondary objective discussed in Comment #2 above. The information gained from Part 5 should not only be used for final remediation but also to consider/develop additional activities in the removal action to capture the leading edge.
6. 2nd Page, 2nd and 3rd Bullets: Considering the past history of cooperation or lack thereof between DOE and the PRRS companies, DOE must discuss the format and time frame

Mr. Jack Craig  
September 25, 1991  
Page 2

during which this coordination will occur. DOE will be best prepared to initiate these discussions following the completion of the Part 5 data collection. Ohio EPA suggests DOE initiate discussions with the PRRS companies at the earliest possible time. Initially these discussions could be aimed at sharing of data and modeling results and potentially working towards a combined removal action between the two sites to capture the Zone 2 groundwater.

7. 2nd Page, 3rd Bullet: The second sentence should be changed to indicate that the O.U. 5 ROD is in the future. One possible wording might be "The area may also contain uranium contamination, but at a concentration below the clean up level that will be specified in the FEMP Operable Unit 5 ROD."
8. 2nd Page, Last Paragraph: The paragraph should discuss that the old effluent pipeline will be investigated and remediated under Operable Unit 3. With the new effluent line being installed under an O.U. 5 removal action, will the new line be part of O.U. 3 or 5?

If you have any questions please contact me.

Sincerely,



Graham E. Mitchell  
Project Manager

cc: Kathy Davidson, Ohio EPA  
Jim Saric, U.S. EPA  
Lisa August, Geotrans  
Ed Schuessler, PRC  
Robert Owen  
John Razor, ASI/IT