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**OHIO EPA COMMENTS ON: WASTE PITS 5, 6
AND CLEARWELL SAMPLING WORK PLAN
ADDENDUM**

09-10-91

**Ohio EPA Comments On:
Waste Pits 5, 6 and Clearwell Sampling Work Plan Addendum**

1. Section 2, p. 2, 1st Paragraph:
 - a) The discussion concerning previous sampling events in the waste pits should reference appropriate work plans or reports to provide support for the position that the pits have been previously characterized. This should also include a discussion of how previous sampling events were conducted so that this information may be used in choosing a sampling method.
 - b) In the fourth sentence, change the reference from "corrective actions" to "closure activities".
 - c) The methods to be used for sampling in support of the RCRA closure actions (Appendix VIII and IX) within these waste pits should be detailed within this work plan. Will these samples be collected using methods similar to those proposed in this work plan? Will the samples be collected at depth and in various locations in order to assure representative samples?
 - d) Although this is not a characterization sampling effort, samples to be collected for treatability studies must be representative of the waste pit contents. The collection of representative samples from the waste pits should be clearly stated as an objective within this section. Discussions supporting the ability of the proposed sampling methods to collect representative samples should be included.
2. Section 3, p. 2, 1st paragraph: State that there is "... open-air exposure of the waste for approximately one-third of the length ...".
3. Section 3, p. 3, 2nd paragraph: Include the actual date when the Clearwell was constructed.
4. Section 4, p. 3: It would appear that because Pit 5 and the Clearwell were filled with solids by settling that there would be more of a need to collect samples at depth than to collect them at numerous surface locations. Perhaps a bailer or clamshell-crane could be used to collect samples at 3-4 locations to a certain depth.
5. Section 4.1, p. 4, 1st paragraph: During field sampling procedures, how does the sampling team know when the slurry pumping operation is removing too much fine suspended particulate matter from the sample material with the decant liquid? DOE should address the effects of the loss of the

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suspended material from the sample on the success/failure of the treatability study.

6. Section 4.4, p. 6 4th Paragraph: DOE should discuss the reason for sectioning material in the Vibra-Core sample prior to placement in the 35-gallon drum.
7. Section 4.5, p. 7: DOE should include consideration of the lower level of control and large splash potential associated with the use of the clamshell-crane in sampling. These factors should be considered when choosing a sampling method as well as addressed in the Health and Safety Plan associated with this activity.
8. Section 5, p.8: The work plan contains no discussion of the decontamination of the heavy equipment between sampling events. Details should be provided as to how and when this will occur.
9. Section 5.2, p. 9: It is unlikely that, if a liner puncture occurs, it would be above the water line on the waste pit. Discuss contingencies should a below the water level puncture occur.
10. Section 6, p. 9: The section should discuss the collection of rinsate blanks from the various types of sampling equipment proposed.
11. Table 1, p. 14, item 12: Reword the comment to clearly indicate if the materials do or do not exhibit any of the characteristics.
12. Table 2, p. 17, item 12: Reword the comment to clearly indicate if the materials do or do not exhibit any of the characteristics.
13. Table 3, p. 19, item 11: Reword the comment to clearly indicate if the materials do or do not exhibit any of the characteristics.
14. Figure 1: Provide a scale and a north arrow.
15. Appendix A, p. A-2, Bullet 3 (under Procedure): Some concern should be given to the moving of filled drums off of the plastic that has been set down to catch the overflow. Plastic perforates quite easily when heavy drums are moved.
16. Appendix A, p. A-3, Bullet 2: Cite the location of the RI/FS procedure for chain-of-custody referenced in the bullet.

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17. Appendix C, p. C-2, 1st Paragraph: In the first sentence the SOP states that this sampling method will be used on Waste Pit 5 but in the second sentence it is stated that this procedure will apply to "any of the three locations identified". Correct this inconsistency.
18. Appendix C, p. C-2, Bullet 1: Some thought might be given to resting the bucket of the backhoe on the edge of the 35 gallon drum and having a worker shovel from the bucket to the drum. Furthermore, it would seem that the water/soluble particle content of the sample would be different when the waste is shovelled from the tarp as when it is dumped from the bucket. Finally, state the size of the bucket that will be used on the backhoe. (A more narrow bucket might be easier to use.)
19. Appendix D, p. D-2, Bullet 7: Explain how DOE will insure no contamination is further spread as a result of dropping the bailer into the waste pit water.
20. Appendix E, p. E-2, Bullet 7, 2nd Sentence: This sentence is confusing. What is meant by "the water line"? Is it the water level in the pit or is it some line marked on the apparatus to determine how far the sampler may be inserted? Please clarify.
21. Appendix F, p. F-2, Bullet 7: Explain how DOE will insure no contamination is further spread as a result of dropping the clamshell into the waste pit water.