

**R-009-208.19**

**2491**

**RESPONSE TO OEPA COMMENTS ON THE  
SOUTH PLUME ESD**

**12/17/91**

**4  
ENCLOSURE  
OU5**

**Response to OEPA Comments on  
The South Plume ESD**

**Commenting Organization: OEPA**

**Comment #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.

**Response:**

Agree

**Action:**

The ESD has been modified to reflect the changes as noted in the comment.

**Comment #2**

1st Page, 2nd Bullet: This secondary objective is misquoted and read ". . . Control of plume migration toward additional receptors farther south. . ." in the Final EE/CA. The objective should be rewritten to comply with the original EE/CA.

**Response:**

Agreed. First bullet was likewise misquoted.

**Action:**

The ESD has been modified to reflect the changes as noted in the above comment and response.

**Comment #3**

1st Page, 4th Paragraph: "Cumine" is misspelled. The correct spelling is "cumene."

**Response:**

Agree

**Action:**

The ESD has been modified to reflect the change as noted in the above comment.

**Comment #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.

**Response:**

Capturing of the PRRS contaminants during the removal action phase would require the construction of facilities to address treatment of both organics and inorganics prior to discharge to the Great Miami River (the IAWWT will only address the discharge of uranium). Constructing permanent (minimum 25 year life expectancy) treatment facilities to address these contaminants in a projected discharge of 2000 gallons per minute would be a major effort. This effort would result in delaying the beginning of the pumping operation for several years.

**Action:**

The ESD has been modified to reflect the information as noted in the above response.

**Comment #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.

**Response:**

The Part 5 investigation will gather additional data that will be issued to support the final remediation selection. This information will aid in the remedial design phase for determining the optimum location for the remedial well field. In addition, Part 5 data could generate data that supports the need for additional response action prior to implementation of the final remediation action for OU5.

**Action:**

The ESD has been modified to state that the information obtained will be used to allow the FEMP to limit access to this water until additional response action(s) for this area can be implemented. (Section 101(25) of CERCLA defines response action to mean remove, removal, remedy, or remedial action.)

**Comment #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 during which this coordination will occur. DOE will be best prepared to initiate discussions following the completion of the Part 5 data collection. Ohio EPA suggests DOE initiate discussions with 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 response action between the two sites to capture the Zone 2 groundwater.

**Response:**

A meeting will be scheduled in December between representatives of DOE, WEMCO, ASI/IT and the PRRS PRPs (principal responsible parties). The meeting will be used to explain the ESD to the PRRS and kick off the possibility of combining the PRRS and DOE South Groundwater Contamination Zone 2 plume into a combined removal action.

**Action:**

Prepare agenda and set up meeting for early December. The ESD has been modified to reflect that these discussions will be initiated.

**Comment #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."

**Response:**

Agreed to suggested wording.

**Action:**

The ESD has been modified to include the suggested wording as noted in the above comment.

**Comment #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 an O.U. 5 removal action, will the new line be part of O.U. 3 or 5?

**Response:**

The existing effluent pipeline will be investigated and remediated under Operable Unit 3. The installation of the new effluent pipeline will be part of O.U. 5 and incorporated into Part 2 of the South Groundwater Contamination Plume.

**Action:**

The ESD has been modified to reflect changes as noted in the above response.