



State of Ohio Environmental Protection Agency

**Southwest District Office**

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George V. Voinovich  
Governor

November 14, 1991

RE: COMMENTS, REMOVAL #11

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

Dear Mr. Craig:

Listed below, are Ohio EPA comments on the Experimental Treatment Facility Removal Action Work Plan. These comments are divided into two sections. The first includes comments from our Remedial Response staff and the second includes comments from our RCRA staff.

REMEDIAL RESPONSE COMMENTS

1. Section 2.1, pg. 2: The narrative should discuss the amendment to the consent agreement, especially because this removal action was designated in the amendment.
2. Section 2.1, pg. 6: Include in this section an estimate of the volume of mixed waste, which will be containerized/generated by this removal action. Discuss the availability of RCRA storage capacity for this material.
3. Section 2.1, pg. 6, par. 2: This section refers to the wood retaining walls. Figure 3, pg. 7 refers to concrete panel forms. Clarify the figure or text so that readers will understand that the walls are wood.
4. Section 4.2: Describe a specific procedure for suppressing airborne contamination during cutting of pipes and wood.
5. Section 4.2.5, pg. 14: does the FMPC Site Policy and Procedures #720 include vegetation as a form of construction debris? If not, review the policy to determine if it would be applicable to vegetation.
6. Section 4.2.6, pg. 14: The work plan should include figures to show how material will be removed and where exclusion and packaging zone will be located.
7. Section 4.2.6e, pg. 15: The section should discuss how piping connecting the ETF to the Waste Pit 5, if it exists, will be removed.

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8. Section 5.0, pg. 17:

a) This section is grossly inadequate and must include more detail. The section fails to discuss sample numbers, location of the samples, or the circumstances which will result in additional sampling requirements. This information must be included in the revised version of this work plan.

b) The soil samples should be analyzed for the full suite of inorganic constituents detected at above background concentration in Waste Pit 5, as listed in table E-2 of the Treatability Study Work Plan for OU1. Additional organic constituents which should be analyzed are PCBs and pthalates.

c) The section must include air monitoring sampling to determine fugitive emissions, which may result from this removal action. At a minimum the same suite of sampling being conducted for the Waste Pit 5 Liner Repair should be conducted during this removal action.

RCRA COMMENTS

**GENERAL COMMENT:**

Within the most recent U.S. DOE-FEMP Part A application submitted as part of the RCRA permitting process, the facility identified the ETF as a Hazardous Waste Management Unit (HWMU). As such, the ETF is subject to RCRA closure requirements.

The RAWP (Section 0.0, Executive Summary) states that closure information is provided which is consistent with RCRA, however, this document does not represent a RCRA closure plan, nor is the information presented at a level of detail consistent with that required for an approvable closure plan.

Pursuant to RCRA regulations, the facility will be required to submit a closure plan to the Director of OEPA. The facility will receive official correspondence concerning closure requirements at a later date.

Subsequent comments concerning the RAWP should not be construed as official comments in response to a closure plan.

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**SPECIFIC COMMENTS:**

SECTION 0.0 EXECUTIVE SUMMARY

- 1) 0.0, pg. 2: This section should indicate how the closure performance standard is to be met. Indicate the type of closure activity chosen to meet the performance standard (clean closure, closure-in-place, closure by risk assessment), and a statement of contingent activity should remediation efforts fail to meet the closure performance standard.

SECTION 2.0 BACKGROUND

- 2) 2.1, pg. 6: The background information should include an estimate of the quantity of waste (sludge, filter media and liner, and structural components) expected to be generated by the ETF removal.

SECTION 4.0 IMPLEMENTATION OF REMOVAL ACTION

- 3) 4.2.6(a), pg. 14: The plan should describe in greater detail those control measures to be employed to contain any spillage of waste materials when the end of the ETF is removed.
- 4) 4.2.6 and 4.2.7: Referenced RCRA storage areas that are to be utilized for container storage should be identified.
- 5) 4.2.6(h), pg. 15 and 4.2.7(b), pg. 16: These sections should be expanded to describe the methodology employed to collect representative samples of the containerized wastes.
- 6) 4.2.6 and 4.2.7: The plan should account for methods to control potential contamination from run-on/run-off during 2nd, 3rd, and 4th phases of the work activity.
- 7) 4.2.9, pg. 16: Site policies and procedures referenced in regard to decontamination methods should be identified and incorporated within the plan. This section should include a list of large equipment, vehicles, and personal protective equipment, if any, to be decontaminated.

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SECTION 5.0 SAMPLING AND ANALYSIS

- 8) 5.0, pg. 17: This section does not adequately address sampling and analytical concerns necessary to meet the closure performance standard. The section should be expanded to detail methodology employed to determine the extent of potential vertical and horizontal soil contamination and contaminant concentrations. The sampling and analysis plan should include the following information and rationale for each selection:

- \* Parameters to be analyzed;
- \* Number of samples and locations;
- \* Background samples;
- \* Sample type;
- \* Sampling methods and equipment;
- \* Analytical methods;
- \* Evidence of a QA/QC plan for lab analysis;
- \* A clear statement of clean levels for soil and rinseate; and
- \* QA/QC procedure for field methods.

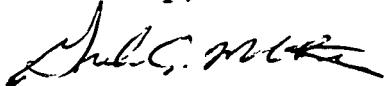
Reference information concerning sampling and analytical guidelines is available (DHWM Closure Plan Review Guidance Document).

SECTION 6.0 HEALTH AND SAFETY

- 9) 6.0, pg. 18: The referenced Health and Safety Plan developed for this project should be included as part of this submittal.

If you have any questions concerning these comments, please contact me.

Sincerely,



Graham E. Mitchell  
 Project Manager

GEM:nys

cc: Jenny Tiell, OEPA, DERR, CO  
 Paul Pardi, DHWM, SWDO  
 Jim Saric, USEPA  
 Lisa August, GeoTrans  
 Ed Schuessler, PRC  
 Robert Owen, ODH

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