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**APPROVAL ETF WORK PLAN**

**12-13-91**



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich  
Governor

December 13, 1991

Re: APPROVAL ETF WORK PLAN

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

Dear Mr. Craig:

This letter will confirm the verbal approval given in Chicago on December 12, 1991, for the Experimental Treatment Facility Work Plan. The attached comments which were faxed to you on December 10, were addressed to our satisfaction in you letter also dated December 10 with the exception of comments 9-11. Ohio EPA requests that comments 9-11 be addressed in a separate letter.

If you have any questions please contact me.

Sincerely,

Graham E. Mitchell  
Project Manager

GEM/acn

Enclosure

cc: Section Manager, DERR, T&PSS  
Jim Saric, U.S. EPA  
Lisa August, GeoTrans  
Ed Schuessler, PRC  
Robert Owen, ODH

(Vincent)  
partial  
action  
response  
to doe-225-92  
(3685)

DEC 15 1991

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OHIO EPA COMMENTS ON  
EXPERIMENTAL TREATMENT FACILITY REMOVAL ACTION WORK PLAN

General Comment

1. In future removal action work plan submittals DOE should incorporate sufficient detail and information to describe the work to be conducted. The agencies should not have to review multiple documents (i.e., Engineering Package, Construction/Maintenance Waste Handling Procedures, etc.) to find basic information which should be in the work plan (i.e., sample locations).

Specific Comments

1. **Work Plan**, Section 4.2.8, pg. 16: This section seems to be not necessarily in agreement with the Engineering Package (Part I Demobilization pg. 1-7) discussion of sample collection below the ETF. DOE should collect the samples at their designated locations immediately after the liner and sand from below the liner have been removed.
2. **SAP**, Section 2.2.2, pg. 4, 3rd paragraph: A biased sample needs to be collected in the area of the sump once it has been removed. This sample should not be one of the four previously proposed unbiased sampling locations.
3. **SAP**, Section 2.2.4, pg. 5: DOE should consider analyzing the wastes for TCA. This information may be useful later for RCRA considerations.
4. **SAP**, Attachment C, Section 1.2: The decontamination procedures described are not sufficient for decontamination of equipment used to collect samples for radionuclides and inorganics. Use the Level III decontamination procedures described in the draft site-wide QAPP, Appendix J.4.7.2.
5. **HSP**, Section 5.2: This section must provide more detail concerning the number of air sampling stations to be used, approximate locations, and schedule of monitoring. Such detail has been provided in previous removal action work plans (i.e., Waste Pit 6 Removal Action).
6. **Engineering Package**, Part I, pg. I-6 & I-7: Additional detail should be provided concerning the "approved clayey soil" to be used for backfill in the sump and on top of the excavated ETF area. Information such as definition of clayey soil, permeability of the soil, and source of the soil should be included.

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7. **Engineering Package, Part II, pg. 2, 3rd paragraph:** One of the four potential stained soil samples should be dedicated to the sump excavation. It is important that this sample not come from the four unbiased sampling locations. The depth and location of the sample places it in a different "strata" from the unbiased samples calculated in this section.
8. **Engineering Package, Part II, pg. 2, Field Procedures:** As stated in above comment #1, samples must be conducted as demolition progresses not after it has been completed.
9. **Construction/Maintenance Waste Handling Procedures, Doc. No. IN-6031, Section 6.0:** DOE should be very conservative in its allowance for the site soils to be used as backfill, especially in uncontrolled areas. The OU1 and OU4 Treatability Study Work Plans include a statement of a remedial action objectives of 5 and 15 pCi/g for thorium, therefore soil with thorium levels  $\leq 10$  pCi/g should not be released for unrestricted use within the FEMP. It makes no sense for DOE to further spread soil which they know will have to be remediated at a later date. All soils meeting or exceeding these proposed remedial action objective level(s) should be stockpiled. The stockpiles should be maintained in a manner to prevent erosion and incorporated into the Improved Storage of Soil and Debris Removal Action #17.
10. **Construction/Maintenance Waste Handling Procedures:** In the definition of construction waste in procedures IN-6031 and IN-6033, both "RCRA waste" and "hazardous waste" are included. Explain the difference between these wastes.
11. **Construction/Maintenance Waste Handling Procedures:** These procedures fail to include any mechanism for determining if these materials are considered a solid waste under Ohio law. DOE should incorporate a solid waste determination within the procedures.