

**R-009-207.41**

**2972**

**REVISION 1 TO CONDITIONALLY APPROVED  
PART 2 AND PART 3 W.P. FOR SOUTH PLUME**

**03/06/92**

**OHEPA/DOE-FN**

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**LETTER**

**OU5**



State of Ohio Environmental Protection Agency

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MAR 9 11 03 AM '92  
George V. Voinovich  
Governor

2972

March 6, 1992

Re: REVISION 1 TO CONDITIONALLY  
APPROVED PART 2 AND PART 3  
W.P. FOR SOUTH PLUME

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's comments to Revision 1 to the  
Conditionally Approved Part 2 and Contamination Plume Removal  
Action.

1. Section 3.2, Page 18: DOE may want to use hand drawn iso-concentration maps for exact location of extraction wells.
2. Section 5.2, Page 18, 2nd Paragraph: DOE should reconsider conducting total rad analyses on monitoring points 607 and 606 (See DOE response to OEPA Comment #6) for a limited duration. Quantitative information on the removal efficiency for other radionuclides will become increasingly important as the site moves towards remediation and waste stream treatment is assessed. DOE should consider these analyses to be an investment for future data needs.
3. Attachment I, Page I-2, Last Paragraph: Define the difference between Total Volatiles etc. and HSL Volatiles etc. What analytes will be measured for each?
4. Attachment I, Page I-2&3: Since VOCs are not the most likely HSL constituents to be present within the suspect areas and VOCs are the most likely to trigger the field screening instructions, DOE should collect HSL samples at locations with radiological contamination as defined by field instruments. The other option would be for DOE to commit to taking a certain number of samples within suspect areas with or without field screening hits.
5. Attachment I, Section 3.1, Page I-3: All soils excavated and removed under this removal action should be handled in accordance with the procedures set for within the Removal Action #17 Work Plan. Soil with above background radiological contaminants should be analyzed for total

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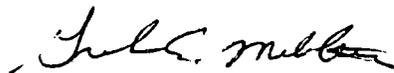
Mr. Jack R. Craig  
U.S. DOE FEMP  
March 6, 1992  
Page Two

uranium, total thorium and radium prior to stockpiling. Soil stockpiles should be underlain with non-permeable tarpaulins and placed within an area captured by the stormwater collection system.

6. Attachment I, Section 3.3.2, Page I-5, 2nd Paragraph: Category II soils should not be released for unrestricted use. It makes no sense for DOE to redistribute soil which it knows will need to be remediated at a later date. See OUI stormwater removal action methodology for detailing with contaminated soils. Additionally, any excess contaminated soil generated as a part of this removal should be handled in accordance with procedures developed in the Removal Action #17 Work Plan

If you have any questions about these comments please contact me.

Sincerely,



Graham E. Mitchell  
Project Manager

GEM/acn

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