

FMPC PADDY'S RUN AND WASTE PIT 5

DOCUMENT DATE 11-14-86



State Of Ohio Environmental Protection Agency

Southwest District Office
7 East Fourth Street; Dayton, Ohio 45402-2086

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(513) 449-6357

Richard F. Celeste, Governor

November 14, 1986

Re: FMPC
Paddy's Run and Waste pit 5

Mr. James A. Reafsnyder, Site Manager
Feed Materials Production Center
Post Office Box 398704
Fernald, Ohio 45239

Dear Mr. Reafsnyder:

As part of some recent documentation we have aquired on FMPC we have reviewed a letter and report by an FMPC consultant named J.D. Eye (Associate Professor, University of Cincinnati) dated January 4, 1961, concerning an inspection he made at FMPC on December 8, 1960. In the report he states that Paddys Run is within 75 to 100 feet of the berm of waste pit #3 and could erode the sidewall. Eye recommends "that Paddys Run be relocated to the west of its present course". Given the fact that the existing channel of Paddys Run is well over 100 feet away from the berm of waste pit #3, we assume that this relocation took place in the early 1960's. Our concern relates to the fact that this information is not addressed in the Weston documents and it would seem that this should be a major focus point for possible contamination of Paddys Run and the aquifer. This same report mentions leaks from pit #3 to Paddys Run and other reports we have reviewed discuss decant pipes from pit #3 along Paddys Run. Additionally, this appears to be the same area that is presently being proposed as an interim catch basin to collect surface runoff from the waste pit area.

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We would like to see any reports you have on when this relocation took place and how it was engineered. Also, assuming this relocation took place, the Weston work plans should be revised to incorporate this "new" information.

In addition to the comments above we would again, like to reiterate our extreme concern about the operation of waste pit #5 as a wastewater treatment unit. The data you submitted with your letter dated 10/24/86 verifies that concentrations are reduced across pit 5 only in conjunction with the clear-well. Our concern, as supported by Mr. Theisen in a letter submitted to OEPA on 7/26/84, is the possibility of increased concentration levels at the effluent of pit 5 as a result of contaminants being leached out of the sludge. Also, considering the reports we have recently reviewed and discussed on tears in the liner and the potential for groundwater contamination, we do not believe any data can justify the continued use of this pit.

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FMPC should take immediate action to stop discharging process wastewaters to pit #5 and the clearwell. This area should be dedicated to the RI/FS study. We understand that pit #5 will continue to receive stormwater and will at least occasionally discharge to the clearwell. However, pit #5 could be drawn down during periods of dry weather and low wind velocity to provide storage capacity which will prevent solids washouts during storm events.

Please note we have discussed the items above with Susan Castle on several occasions. We would like to see a quick response from DOE on the items discussed above and are most anxious to see a time schedule by which use of pit #5 could be discontinued. Any opportunity to discuss this matter in further detail with you and your staff is welcomed.

Sincerely,



Thomas A. Winston, P.E.
Chief, Southwest District Office

TAW:lmr:JAG

cc: Jack VanKley, CO
Steve Clough, USEPA, Region V