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**ACTIVE FLYASH PILE REMOVAL ACTION WORK  
PLAN**

03-16-92

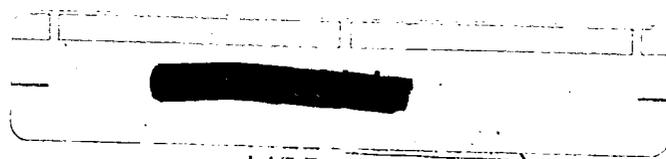
**OEPA/DOE-FO  
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LETTER**



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich  
Governor

3029

March 16, 1992

RE: ACTIVE FLYASH PILE  
REMOVAL ACTION W.P.

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 on the Active Flyash Pile Removal Action Work Plan.

1. Executive Summary, pg. vi, 2nd paragraph: Please provide a discussion in the text of ARARs which apply to this removal action.
2. Section 2.2, pg. 1, last paragraph: Please define unrestricted release values for radionuclides. What values allow unrestricted release?
3. Section 2.2, pg. 1, last paragraph: It is assumed by Ohio EPA that DOE will be able to determine in the RI report that the flyash is "non-toxic" and non-hazardous and contains radionuclides below unrestricted release values."
4. Section 2.2, pg. 6, 2nd and 4th paragraphs: DOE should not reference the 1990 draft RI. This document is not available for public review and should not be referenced.
5. Section 2.2, Table 2-3, pg. 9: Why is an average value given for Ra-226 when only 1 positive detection is reported? This is not the procedure followed for other single detections. Please correct the table.
6. Section 2.6.2, pg. 15, 5th bullet: DOE needs to work to minimize the application of water to the flyash pile within this removal action.
7. Section 2.6.3.1, pg. 16, 1st paragraph: Why is vegetation around the toe of the pile being removed? It would seem that the vegetation would help reduce erosion and runoff around the pile.

*(revising)  
partial  
action response  
to +-0860 (3989)*

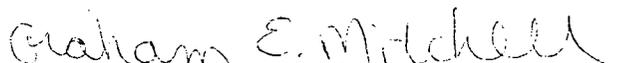
Mr. Jack R. Craig  
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8. Section 2.6.3.5, pg. 2-19 and Section 4.2, pg. 4-1: These passages address the sectioning of the flyash pile into active and inactive areas. The description of activities given is confusing. This is especially true in Section 4.2 where it is stated that "no additional ash will be deposited and no additional grading will be performed" in inactive areas. Yet the following sentence states that the inactive and active areas will continually be changing. This indicates that there will be further deposition and grading of flyash in previously designated inactive areas. Please provide a detailed description of the plan to deposit and grade flyash that will clarify the statements made in the Work Plan.
9. Section 3.1, pg. 1, Table 3-1: The fact that this is designated a time-critical removal action requires that action be taken in less than 35 weeks. DOE must take a more timely action to meet the requirements of a time-critical removal action. It is not clear to Ohio EPA what part of this removal action would require 35 weeks to design. The time requirements of this work plan must be more clearly defined and justified.

If you have any questions please contact Tom Schneider or me.

Sincerely,

  
Graham E. Mitchell  
Project Manager

cc: Jennifer Kwasniewski, DERR  
Jim Saric, U.S. EPA  
Dennis Carr, WEMCO  
Lisa August, GeoTrans  
Tom Hahne