

**R-027-207.1**

**3074**

**REMOVAL ACTION #16**

**04/07/92**

**OEPA/DOE-FN**

**4**

**LETTER**

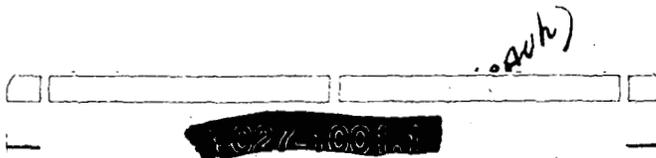
**OU5**



State of Ohio Environmental Protection Agency

Southwest District Office

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Handwritten notes: "CY = 1/2 gal 1/2 gal", "PA", "1/2 gal"

Handwritten number: 5074

George V. Voinovich  
Governor

April 7, 1992 APR 08 1992

Re: REMOVAL ACTION #16

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 Removal Action #16 -  
Collect Uncontrolled Production Area Stormwater Runoff Work Plan.

General Comments

1. DOE has failed to address the issue of buildover criteria in this work plan. Buildover criteria were addressed in the development of the Waste Pit Area Stormwater Runoff RA and appeared to be a reasonable approach. If it is feasible to achieve the buildover criteria within the production area, DOE should integrate this into the removal action work plan.
2. It would be helpful to the reviewer to include a figure delineating the total area of the FEMP which will be captured by the site stormwater system following the completion of this removal action and the Waste Pit Area Stormwater Runoff RA. Such a figure will allow the EPAs a better understanding of potential soil storage areas which would be within a runoff capture system. A figure delineating the drainage area covered by the FEMP stormwater sewer system will be helpful to the agencies and the DOE.
3. DOE needs to consider the development of an post-excavation sampling plan. Data from such a sampling plan will be useful not only for determining compliance with buildover criteria but also for inclusion into the OU5 RI. Analyses on the soils below concrete structures proposed in this work plan are important data for the RI which will be much more difficult to obtain following completion of the project.

Specific Comments

1. Section 1, Page 1: Describe the elevated concentrations of uranium in these uncontrolled areas.

Mr. Jack R. Craig  
U.S. DOE FEMP  
April 7, 1992  
Page Two

3074

2. Section 2, Page 3: Describe the pathway for contaminant migration to Paddys Run. Does rainwater pick up dissolved uranium or is the uranium associated with soil particles?
3. Section 2.2, Page 4, 1st Paragraph: A recent PTI submitted for Manhole 34 indicates that all stormwater will go to the SWRBs. Basically, this section should reflect this by describing that no stormwater will flow directly to Manhole 175 except in a spill condition.
4. Section 2.4, Page 6, 1st Paragraph: It is essential that activities undertaken as a part of this removal action are coordinated and consistent with the final remedial alternatives for all operable units potentially affected.
5. Section 2.4, Page 6, Bullets: DOE should not be stating or selecting remedial alternatives at this early stage. This section must be rewritten to discuss all potential alternatives for OU5 and how they might be affected by this removal action. Discussion of leading or "most likely" alternatives should be limited to the Site-Wide Characterization Report and associated Feasibility Study Risk Assessments. DOE must refrain from making the appearance that alternatives have been preselected.
6. Section 2.4, Page 6, Last Paragraph: DOE must integrate the activities of all operable units when developing schedules. DOE needs to determine if work on RCRA units, OU3, or USTs would affect the schedule of this removal action and present the conclusion of this determination within this section.
7. Section 4.1, Page 9, 4th Paragraph: DOE should discuss the depth to which excavations will need to be made. Has DOE investigated the estimated depth to perched ground water in the areas where trenching and sewer line excavations will be conducted? If ground water is encountered how will this be dealt with? These and other potential problems should be discussed within the work plan.
8. Section 4.2, Page 10: This section should reference Removal Action 17, Improved Storage of Soil and Debris and the implementation of procedures developed therein.
9. Section 4.2, Page 10: Is it possible for DOE to minimize disturbances by selecting smallest practicable pipe sizes and minimum pipe depths because of the small drainage areas?

Mr. Jack R. Craig  
U.S. DOE FEMP  
April 7, 1992  
Page Three

3074

10. Figures C-1 to C-5: These figures would be more useful to the reader if it were possible to delineate the area of uncontrolled runoff that is going to be captured on each figure. This would be an incorporation of Figure 1 into these figures. As presented the figures are difficult to interpret and don't clearly show the effect of the proposed construction.
11. Attachment I, Section 5.0, Page 3: DOE should employ field screening of soils during excavation in order to segregate and box soils with uranium concentrations exceeding 100 pCi/g or thorium levels exceeding 50 pCi/g. Screening and boxing of soils during excavation will prevent the mixing and resultant dilution of contaminated soil. Such a procedure may reduce the amount of soil to be boxed and potentially the amount of mixed waste.
12. Attachment I, Section 5.0, Page 3, 2nd Paragraph: Will sufficient sample be retained from each core on specific samples to collect both full TCLP and HSL Plus? It would seem such analyses would require a significant quantity of soil. Please address this within the text of the work plan.
13. Attachment I, Section 5.0, Page 3, 4th Paragraph: It seems inappropriate to analyze QA/QC blanks (i.e., rinseate blanks) for full TCLP. There should be a more inexpensive and practical approach for DOE to take. Is this methodology required under the QAPP?
14. Attachment II, Section 1.2, Page 1: DOE must incorporate an evaluation of the HSL constituent concentrations within soil stockpiles with regard to stockpile disposition. DOE must be aware that just because soils are not RCRA hazardous waste or above 35 pCi/g of uranium does not mean they can or should be freely distributed across the site. Continually moving soil which may contain levels of HSL contaminants above cleanup levels makes no sense. If DOE continues to move soils around the facility without regard to HSL concentrations, then an accurate and complete Remedial Investigation report can never be written. If DOE insists on redistributing contaminated soils, it will need to develop a system for tracking these soils from storage to disposition in order to develop an adequate RI report.
15. Attachment II, Section 1.2, Page 1, Bullet: DOE needs to evaluate HSL concentrations in soils prior to their free release.

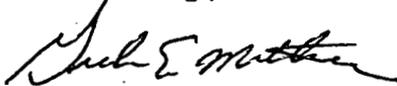
Mr. Jack R. Craig  
U.S. DOE FEMP  
April 7, 1992  
Page Four

3074

16. Attachment II, Section 1.2, Page 2, 1st Bullet: What is the difference between Category II and Category I soils with regard to disposition? As stated previously in numerous Ohio EPA comments, it makes no sense for DOE to redistribute soils which they know are above cleanup standards for the site. DOE must consider both HSL concentrations of the stockpiled soil and radionuclide and HSL concentrations in the area of disposition. The most expedient pathway for DOE to take at this point for soils contaminated over 35 pCi/g uranium and 15 pCi/g thorium, which we are confident exceed cleanup levels for the site, is to pursue treatment options and begin treatment of these soils. Perhaps DOE needs to begin to develop a removal action or pilot project for soil treatment.

If you have any questions about these comments, please contact Tom Schneider or me.

Sincerely,



Graham E. Mitchell  
Project Manager

GEM/acn

cc: Jenifer Kwasniewski, DERR  
Tom Schneider, DERR  
Jim Saric, U.S. EPA  
~~Dennis Carr, WEMCO~~  
Lisa August, GeoTrans  
Tom Hahne, PRC  
Robert Owen, ODH