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**WORK PLAN ADDENDUM O.U. 2 SOLID WASTE
LANDFILL TRENCHES**

04-01-92

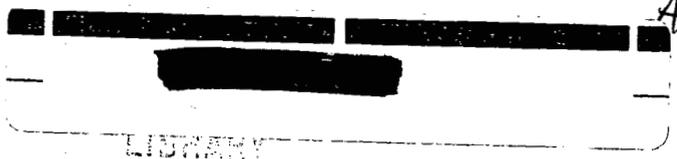
**OEPA/DOE-FN
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LETTER**



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich
Governor

April 1, 1992

Re: W.P. ADDENDUM
O.U. 2 SOLID WASTE
LANDFILL TRENCHES

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

Dear Mr. Craig:

The purpose of this letter is to conditionally approve the Work Plan Addendum for the Trenches in the Solid Waste Landfill. The conditions for approval are that DOE address to Ohio EPA's satisfaction the comments attached. Ohio EPA also requests that DOE notify us in sufficient time as to when field activities will take place and what level of protection will be required for observers.

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

Sincerely,

Graham E. Mitchell
Project Manager

GEM/acn

cc: Jenifer Kwasniewsky, DERR
Tom Schneider, DERR
Jim Saric, U.S. EPA
Lisa August, GeoTrans
Tom Hahne, PRC
Robert Owen, ODH

Specific Comments

1. Section 2.0, Page 1: Please attach logs for the five borings referenced in this section to the work plan. Also, be more specific regarding the sample recovery problems encountered with three of these borings (i.e., what may have caused the non-recovery?).
2. Section 4.0, Page 4, Paragraph 2: While it is understood that any sampling conducted during this event will not be incorporated into the RI report, the collection of soil samples from areas of obvious contamination (i.e., staining, field instrument readings) should be included in the work plan. This information will then be available for use in the RD/RA phase.
3. Section 4.0, Page 4, Paragraph 2: Define and discuss a SPA-3 probe and what it measures.
4. Section 4.0, Page 4, Paragraph 2: Provide more specific information regarding determination of trench depth. Measurements should be taken at regular intervals along the length of the trench. Such detail needs to be incorporated into the text.
5. Section 4.0, Page 4, Paragraph 3:
 - a) Please address the issue of water collection in the trench more thoroughly. Will the water simply be left in the trench no matter what its source? What if the trench has "zones with high counts" as indicated by field instrument readings? Water collecting in the trenches may lead to the leaching of contaminants deeper into the soil.
 - b) Efforts need be made to prevent rainwater from entering trenches. Procedures to prevent rainwater entry should be described in the text.
6. Section 4.0, Page 4, Paragraph 5: Please provide more detail in regards to backfilling the trench. Typically, excavation activities such as this lead to areas of higher permeability than was originally present. The trenches will likely be underfilled or overfilled. Compaction and potentially the addition of less permeable or fill material needs to be discussed in this work plan.