

R-029-207.4

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**WASTE PIT 5 EXPOSED MATERIAL REMOVAL
ACTION WORK PLAN**

04-30-92

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State of Ohio Environmental Protection Agency

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3239 George V. Voinovich
Governor

April 30, 1992

Re: WASTE PIT 5 EXPOSED MATERIAL
REMOVAL ACTION WORK PLAN

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 Waste Pit 5 Exposed Material Removal Action Work Plan.

General Comments

1. Ohio EPA's support for DOE's proposal of a water cover on Waste PIT 5 is based mainly upon remediation considerations. OEPA assumes that Pit 5 will be the first waste pit to undergo remediation and that this remediation will hopefully begin on a bench/pilot scale within the next two years. Based upon this assumption it seems unjustified to spend significant monies and create additional waste through the completion of some type of interim cover/cap. If OEPA's assumption of early remediation is incorrect, DOE needs to consider a more reliable interim measure than 0.3 feet of water cover.
2. What other alternatives did DOE consider for this removal action?
3. DOE should discuss the potential groundwater impacts of the continued and possibly increased hydraulic pressure on the liner under the PIT 5 waste material.

Specific Comments

1. Section 3, pg. 3-1, 1st Paragraph: The air filter analyses described in this paragraph do not correspond to those required in the Pit 5 Liner Repair WP (10/4/91, pg. 6). What basis did DOE use for deviation from the work plan?
2. Figure 3-1, Environmental Plan: Waste Pit 3 has been incorrectly identified as "Scrap Pit Number 5". Please correct.

(VIA) TECHNICAL SERVICES
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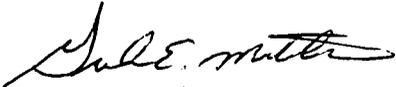
3. Table 3-1, pg. 3-3:
 - a) Which date represents the three baseline air samples described in the Waste Pit 5 Liner Repair WP?
 - b) The table should include the total uranium and total thorium concentrations as described in the Waste Pit 5 Liner Repair WP.
4. Section 6, pg. 1: This work plan fails to include a detailed description of any work. DOE needs to provide a detailed description of the waste movement method within this Removal Action Work Plan.
5. Section 6, pg. 1: A 0.3' water cover does not seem very reliable and will be difficult to maintain. DOE needs to provide more detail as to how such a uniform distribution of the material within the waste pit will be attained.
6. Section 6, pg. 1, last sentence: The intent of this sentence is unclear. While it is true that more water would increase the depth of the water cover, the requirements of OAC 3745-67-22 must be met.
7. Section 7.2, pg. 1: It is unclear, due to the lack of detail within the work plan, what field activities will require 12 weeks. Additionally, design should not take 16 weeks. DOE needs to include more detail and justification for such extended activity durations.
8. Section 7.2, pg. 2, 1st Paragraph: Design details should be included within this Removal Action Work Plan.
9. Section 10.1, pg. 1, 1st Paragraph: A date by which the four additional air monitoring stations will be installed needs to be included in this section.
10. Section 10.1, pg. 1, 1st Paragraph: DOE should consider continuing use of the high volume air monitoring samplers and locations used for the Pit 5 Liner Repair action. The use of these samplers and associated analyses would allow for a continuous data base on activities around the pit and allow for evaluation of the effectiveness of the removal action.

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April 30, 1992
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If you have any questions about these comments please contact Tom Schneider or me.

Sincerely,



Graham E. Mitchell
Project Manager

GEM/ycrc

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