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OHIO EPA COMMENTS OU5 WORK PLAN ADDENDUM

5-19-92

OEPA/DOE
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COMMENTS
OU5

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Ohio EPA Comments
OU5 Work Plan Addendum

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General Comments

1. A number of areas within Operable Unit 5 appear to still be uncharacterized. These areas are listed below. DOE should discuss when and how each of these areas will be or have been characterized. If these areas have not been fully characterized to define the nature and extent of contamination, the investigation of these areas should be incorporated into this work plan addendum.

   1) Plant 2/3 perched groundwater zone.
   2) Trapshooting range soil contamination.
   3) Outfall pipeline soil and groundwater contamination.
   4) Reported lab pits under the parking lot

   Some of these, such as the outfall pipeline, have been investigated under Ohio EPA Consent Decree. In these cases, DOE needs to provide a mechanism for incorporating these studies into the RI/FS.

2. The Ohio EPA has concerns about the use of samples collected from piezometers for risk assessment development. The original PASA Addendum (10/89 pg. 2-9) supported the use of piezometers for sampling under specific conditions. The first condition was based upon a single sampling event, yet this work plan proposes a second sampling event and most likely a third since we would expect VOC contamination and the resulting resampling for full HSL. The second condition was that if organic contamination was found which "are incompatible with or affected by PVC, and require long-term monitoring" the PVC would be removed and a stainless steel well installed. VOC contamination has been detected in a number of piezometers. Additionally, three years have passed since the original work plan approval and we are still monitoring with the piezometers, not to mention that the OU5 ROD is not expected until 1995. It is the opinion of Ohio EPA that the intent of the original work plan was to determine if chemical contamination existed in the perched zone and if contamination did exist to install stainless steel monitoring wells to monitor and define the extent of this plume. DOE must also consider the RCRA requirements for monitoring these contaminants and the stainless steel requirements of that monitoring program. DOE needs to provide justification for their current and future uses of PVC piezometers.

Specific Comments

Plant 1 Pad Area

1. Table 1, pgs. 4 & 5: The table should provide a reference for the source of the data listed. The reference will make it easier for the reader to relate the data back to the text.

2. Table 2, pg. 8: The table should provide a reference for the source of the data listed. The reference will make it easier for the reader to relate the data back to the text.

3. Section 2.0, pg. 9, last paragraph: DOE should be able to include actual data within the work plan addendum for samples which were collected a year ago. The incorporation of this data into the work plan would help better direct the depth and type of sampling.

4. Section 2.0, pg. 9, last paragraph: The Plant 1 Pad Removal Action Work Plan required DOE to sample 5 monitoring wells and piezometers (1055, 1339, 1342, 1345, 2055) in the area of the pad for full HSLs and to incorporate positive hits into the quarterly monitoring program. The Work Plan states,

   > "...To augment this baseline data, one round of samples will be withdrawn from the listed wells (noted asterisks above) prior to construction activities for full Hazardous Substance List (HSL) analysis. These samples will be analyzed in a manner consistent with the FS RI/FS QAPP.
   > Routine samples will be analyzed for the parameters listed in Table 8-1. Any additional constituents in significant concentrations from in the HSL analysis will be added to the list in Table 8-1 for both that well and for vicinity wells."(pg.8-6)

   DOE needs to incorporate the data gathered under the monitoring well sampling required by the Plant 1 Pad Removal Action and the quarterly monitoring into this Work Plan Addendum.

5. Table 3, pg. 10 and Table 4, pg. 11: The table should provide a reference for the sources of the data listed. The references will make it easier for the reader to relate the data back to the text.

6. Section 3.0, pg.14, last paragraph: DOE should consider the inclusion of Uranium-233 into the sample analysis. See DOE Response to Comments on the Risk Assessment Work Plan Addendum Comment #45. If U-233 was stored in drums on-site, storage most likely occurred on the Plant 1 Pad.

7. Section 3.0, 2nd paragraph, pg. 16: The work plan should detail how borings into the Plant 1 Pad will be abandoned to prevent the migration of contaminants.

8. Section 3.0, last paragraph, pg. 16: Has previous experience suggested that boreholes within this area will maintain their integrity? How will DOE prevent the collection of overly turbid samples? DOE should consider the installation of a temporary monitoring well/piezometer within the borehole and then remove it once water samples have been collected.

Southeast Quadrant of the Production Area

1. Figure 5, pg. 12: In order to better define the extent of perched groundwater contamination, DOE should consider placement of an additional boring between borings 1173 and 1866.

2. Section 3.0, pg. 13, 4th paragraph: A reference to the K-65 slurry line/Clearwell Addendum should be made within this paragraph. Additionally, the location of the borings referred to in this paragraph should be provided on a figure. This additional information will better enable the reader to follow the various investigations planned.

3. Section 3.0, pg. 15, last paragraph: DOE should follow the most up to date procedures for drilling, sampling, and well installation and when the Site-wide QAPP is approved it should be followed.

4. Table 7, pg. 16: The footnote "f" should be added to all TAL references within the table.

Fire Training Area

1. Section 3.0, pg. 8: DOE should incorporate sampling for dioxins/furans with the fire training area soils and sediments. The burning of waste oils including PCBs could result in the production of these compounds. Dioxins have been detected within the fire training structures at the USDOE Mound facility.

2. Section 3.0: DOE should incorporate sampling from the proposed RCRA monitoring wells for the Fire-training area into this sampling plan.

3. Section 3.0, Figure 4, pg. 15: What is DOE's justification for placing the western most proposed sampling location so far downgradient of the fire-training area? It appears that the sampling location would be better located close to the fence crossing.

KC-2 Warehouse Area etc.

1. Section 1.0: Does DOE plan to investigate the tile that drains the fire training area? Where does this tile flow? Some basic dye testing and chemical sampling would seem appropriate.

2. Section 2.0, pg. 1: It is not clear as to why PCBs are the only contaminant of concern within the KC-2 Warehouse and Scrap metal areas. The general practices in these areas (storage of wastes including PCBs and scrap metals) suggest other contaminants would be present including radionuclides and other chemical contaminants. Because of the location, air deposition of uranium must be considered.

3. Section 3.0: If PCBs are the primary contaminant of concern in this investigation, DOE should consider the widespread use of field screening technologies supported by selected samples for RI/FS analysis. The use of field screening technologies is supported by the large area over which the scrap metal existed.

4. Figure 2: The use of six surface soil samples to characterize approximately 350,000 square feet of area is not acceptable. DOE should consider the use of field screening technology and/or an increase in sample numbers.

5. Table 2: The limited amount of sampling proposed in this addendum is unlikely to provide sufficient information to determine the nature and extent of PCB contamination. Additionally, DOE is failing to define the nature and extent of other potential contaminants.

K-65 Slurry Line and Clearwell Line

1. Section 3.0, pg. 4: DOE fail to provide a justification for the placement of some 1000 series boring as monitoring wells and some as piezometers. DOE must discuss this differentiation within the work plan.

2. Section 3.0, Table 1, pg. 6: DOE must include within this table the contingency for sampling for full HSLs when VOCs are detected (see pg.5). DOE will save both time and money, if it

analyses all piezometers and monitoring wells with previous detections of VOCs for the full HSL.

3. Section 3.2, pg. 8, 2nd paragraph: The second and third sentences appear to be contradictory. Please clarify this paragraph.

4. Section 3.2, pg. 8, 5th paragraph: DOE should provide a reference for the RCRA program work plan. Additionally, DOE should integrate the sampling of the RCRA monitoring wells into this work plan.

5. Section 3.7, pg. 14, last paragraph: Well 2419 should be included in Figure 1. It is unclear as to whether well 2419 will be sampled under this work plan or if the results of previous sampling will be integrated with the results from this work plan. Please clarify this within the text.

Appendix A

1. TAL 3.17 C: DOE should consider the addition of beryllium and antimony to the inorganics list, since these two analytes appear to be present across the site.

Appendix B

1. DOE should use RAGS Part B for the development of Preliminary Remediation Goals.

2. Table B-3: The table appears to be missing a page since Trichloroethane, Trichloroethene, etc. are not included.