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R-027-208.1

RESPONSE TO USEPA COMMENTS ON REMOVAL ACTION NO. 16 COLLECT UNCONTROLLED PRODUCTION AREA RUNOFF

05/20/92

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RESPONSE TO USEPA COMMENTS ON
REMOVAL ACTION NO. 16
COLLECT UNCONTROLLED PRODUCTION AREA RUNOFF

Commenting Organization: USEPA

General Comments

1. The work plan does not provide any method for determining the effectiveness of the RA. The work plan should describe how the proposed RA will meet the objective of protecting human health and the environment. The work plan should present the current situation in quantifiable terms, such as the concentration of contaminants in surface water and soils as well as volumes of uncontrolled surface water. In addition, the work plan should present specific quantifiable goals that can be measured to determine the effectiveness of the RA. In part this issue may be addressed by providing the removal site evaluation (RSE) as an appendix.

   Response:
   The RSE has been provided as an attachment. The additional drainage area being collected has been written into section 2.1 to reflect the current situation. There is no method of measuring the volume of additional runoff. Therefore, a quatifiable goal cannot be defined as a measure of effectiveness. Visual inspection of the system to verify that positive drainage exists and runoff is directed to the trench drains is the only means of determining the effectiveness of the removal action. The objective of the removal action has been added to section 2.3.

   Action:
   The document has been revised as noted in the response.

2. The work plan does not present any discussion of applicable or relevant and appropriate requirements (ARAR). The EPA Guidance on the Consideration of ARARs During Removal Actions (EPA/540/P-91/001) requires that ARARs be identified in the action memorandum's work plan stage. The national contingency plan (NCP) (40 CFR 300.415(i)) requires that the RA shall attain ARARs to the extent practicable, and that waivers described in 40 CFR 300.430(f)(1)(ii)(C) may be used. The work plan should present specific ARARs that will need to be considered, a description of why they should be considered or waived, and any waiver justification.

   Response:
   A table outlining the applicable, relevant, and appropriate requirements (ARARs) has been added to section 1.0.

   Action:
   The document has been revised as noted in the response.

3. The work plan does not include any formal reporting requirement. The work plan should include an interim report to EPA describing the results of pre-excavation sampling and a final report describing all RA activities and a determination of its effectiveness.

Response:
WEMCO feels that an interim report is not necessary. A final report will be issued and this has been noted in section 8.0.

Action:
As noted in the response.

4. There was no comment number 4.

5. The figures provided in the work plan are inadequate to describe the RA. The figures should include a scale and a complete description of field activities. For instance, the work plan should include figures showing current drainage patterns and proposed containment of drainage conditions.

Response:
Revised drawings have been added to the work plan.

Action:
The document has been revised as noted in the response.

<u>Specific Comments</u>

6. Section 4.1, Page 9, paragraph 1: The four drawings referenced (C-2 through C-5) are inadequate to fully describe the field actions required to complete the RA. The work plan should present specific information describing the necessity and scope of each proposed field action as well as the specific activities to be completed.

Response:
Revised drawings have been added to the work plan. Wording has been added to the text describing the scope of the field activities.

Action:
The document has been revised as noted in the response.

7. Section 8.0, page 14, paragraph 1: The schedule presented in the work plan is inadequate to describe the work and allow EPA to track the progress of the RA. The schedule should present, at a minimum, start and finish dates of the design, dates for bid and award of subcontracts (if necessary), start and finish dates for pre-excavation sampling activities, start and finish dates for construction activities and dates for interim and final reports.

Response:
A revised schedule has been provided in Section 8.0.

Action:
The document has been revised as noted in the response.

8. Section 8.0, Page 14, paragraph 1: The completion date of December 31, 1993 (22 months after the work plan submittal date), appears excessive for completing this "time critical" RA, considering the relative ease of implementation. DOE should reconsider the time requirement and present a

revised schedule or provide justification for needing 22 months to complete a relatively straightforward RA.

Response:
The December 31, 1993 completion date is for the total construction project which includes both the removal action and the rehabilitation and/or repair portions of the existing storm sewer system.

After reviewing the schedule the proposed completion date for the removal action has been changed to August 30, 1993.

Action:
As noted in the response.

9. Attachment 1, Section 3.0, page 2: This section discusses several sample locations (for example SSI-30) but fails to identify them in any of the figures. The location of all sample locations discussed should be identified in a figure.

Response:
These sample locations and corresponding characterizations were taken from the July 1989 document referenced in the second paragraph of Attachment 1, section 1. The RSE which has this document appended to it is being included as an attachment to the work plan.

Action:
The document has been appended as noted in the response.

10. Attachment 1, Section 4.0, page 2: Sample locations 12 through 14 appear to be outside the trench area shown in Figure C-3. This discrepancy should be addressed.

Response:
Sample locations have been changed to reflect their correct locations within the proposed trench excavation.

Action:
The document has been revised as noted in the response.

11. Attachment 1, Section 4.0 page 3: The trench drain identified, which is to occupy the same locations as samples 39 through 42, is not shown on Figure C-4. Figure C-4 should be corrected.

Response:
The proposed action for this area is the addition of new curbing and not a trench drain. The text has been changed to correct this discrepancy.

Action:
The document has been revised as noted in the response.

12. Attachment 1, Section 4.0, page 3: The discussion in this section is inadequate to justify the sample points illustrated in Figures C-6 through C-8. The work plan should provide the rationale for the number of samples and the location and spacing of samples.

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Response:
In general the number of samples, the location, and spacing of sample points were derived using guidelines provided in EPA document 230/02-89-042. Specifically, the number of sample points per sample are calculated using the test of percentile methods (normalized data) contained in Chapter 2 of EPA document 230/02-89-042. Values corresponding to an alpha rate of 20%, a beta rate of 20%, a P0 of 20%, and a P1 of 10% were input into the computer algorithm to determine the number of sample points. Subsequent to calculating the number of sample points required, the computer algorithm generated the location and spacing of sample points using random selection methods contained in chapter 5 of the EPA document 230/82-89-042.

Action:
The document has been revised as noted in the response.

13. Attachment 1, Section 5.0, page 3: None of the randomly selected depths presented in Table 1 are below a depth of 3 feet. The work plan should describe how samples will be collected if the excavation is advanced below 3 feet.

Response:
Excavation for the installation of the trenches is not to exceed 3 feet, therefore the maximum sampling depth of 3 feet is adequate. If this situation changes, the sampling depths at those specific locations will be randomized using the maximum anticipated depth.

Action:
No action required.

14. Attachment 1, Section 5.0, page 3: The installation of 12-inch-diameter reinforced concrete pipe (RCP) will require excavation; however, the work plan does not address soil sampling in these areas. The work plan should either add sampling in these areas or explain why no sampling is planned.

Response:
The installation of the 12 inch diameter pipes and structures is part of the second portion of the Storm Sewer Improvements Project as described in Section 2.3. It is separate and distinct from the subject removal action.

Action:
No action required.

15. Attachment 1, Table 2, page 6: The work plan does not provide specific rationale for selecting sample locations for hazardous substance list (HSL) analysis. The work plan should provide specific rationale for selecting some locations over others for HSL analysis.

Response:
The rationale for selecting locations for HSL analysis is explained in section 4.0

Action:
No action required.

16. **Attachment 2, Section 1.1, page 1: New waste piles, containing mixed or hazardous waste, generated from the RA must meet the substantive minimum technology requirements in 40 CFR 264 Subpart L.**

Response:
The piles of excavated soils will not serve as long term storage of hazardous waste. It is not anticipated that these soils will be RCRA hazardous. In the event that said soils are found to be hazardous, the tarpaulin covered piles will serve as satellite accumulation areas only. They will be properly handled in accordance with the Removal Action #17, "Improved Storage of Soil and Debris" Work Plan which covers the requirements of 40 CFR 264 Subpart L does not apply.

Action:
The Removal Action No. 17 Work Plan has been referenced.

17. **Attachment 2, Section 1.2, page 1: No apparent difference exists between the handling of Category I and Category II soil. The work plan should provide additional information to clarify this issue.**

Response:
All soils will be handled as a in accordance with Removal Action #17, "Improved Storage of Soils and Debris" Work Plan.

Action:
The document has been revised as noted in the response.

18. **Attachment 2, Section 1.2, page 1: The work plan does not address soils that are classified as RCRA wastes and have depleted uranium concentrations of less than 100 picocuries per gram (pCi/g) or thorium concentrations of less than 50 pCi/g. The work plan should address soils meeting this description.**

Response:
All soils that are found to be RCRA hazardous will be handled as a hazardous waste in accordance with Removal Action #17, "Improved Storage of Soils and Debris" Work Plan.

Action:
The document has been revised as noted in the response.

19. **Attachment 2, Section 1.2, page 1: The work plan proposes to combine all excavated soils into three waste piles. Excavated soils should be separated based on field screening to avoid mixing (1) potentially low-level waste with soils that are not low-level wastes or (2) soils that are potentially RCRA hazardous wastes with those that are not.**

Response:
All soils will be placed in piles of clean, potential radiological, potential RCRA, or potential mixed soils. The determinations as to which pile to place excavated soils in will be made from the data generated during field screening. This will enhance waste minimization efforts.

Action:
The document has been revised as noted in the response.

20. **Attachment 2, Section 1.2, page 1: The work plan divides excavated soils into several categories based on their average contaminant concentrations. However, the work plan does not describe how the average concentration will be determined. Averaging the analytical results from the pre-excavation sampling is not appropriate. Waste piles should be sampled and characterized in a manner consistent with EPA Document SW 846.**

Response:
The determinations on the hazard classification of the excavated soils will be based on the field screening data.

Action:
Document has been revised as noted in the response.

21. **Attachment 2, Section 1.2, page 1: Redistributing soils that are above the potential cleanup level of 35 pCi/g for uranium and 10 pCi/g for thorium may not be appropriate and may not comply with ARARs.**

Response:
These soils will be categorized as Category II soils and will be managed in accordance with Removal Action #17, "Improved Storage of Soils and Debris" Work Plan.

Action:
The document has been revised as noted in the response.