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**R-027-208.2**

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

**05/20/92**

**DOE-FN/EPA**

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**ENCLOSURE**

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

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**Commenting Organization: OEPA**

**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.

**Response:**

Buildover criteria were not addressed in this work plan because the proposed structures are easily removable for further clean up unlike the massive collection sump which was constructed at the waste pit area. The trench drains are not considered to be permanent structures.

**Action:**

No action required.

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.

**Response:**

Revised maps have been added to the work plan which better reflect the drainage areas covered by the storm sewer system and the proposed improvements. The drainage areas to each of the trenches on the individual figures was not shown, but an additional figure was added which reflects the drainage patterns.

**Action:**

The document has been revised as noted in the response.

3. DOE needs to consider the development of a 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 OUS 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.

**Response:**

The trench drains which are being proposed are only 1 foot wide with 6 inch concrete sides for a total width of 2 feet. It is not expected that there will be difficulty in obtaining sampling following the completion of

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this project.

**Action:**

No action required.

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Specific Comments

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

**Response:**

The Removal Site Evaluation (RSE) which describes the elevated uranium concentrations has been added to this work plan as Attachment 3.

**Action:**

The document has been revised as noted in the response.

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?

**Response:**

Section 2.1, paragraph 1 now states that the uncontrolled stormwater runoff contains dissolved uranium.

**Action:**

The document has been revised as noted in the response.

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.

**Response:**

Wording has been added to Section 2.2 to reflect that the dry weather flow will go to the SWRB instead of the Great Miami River. If a spill occurs, the flow will still be diverted to the General Sump for treatment.

**Action:**

The document has been revised as noted in the response.

4. Section 2.4, Page 6, 1st Paragraph: It is essential that activities undertaken as a part of this removal action are alternatives for all operable units potentially affected.

**Response:**

Paragraph has been revised to include Operable Unit 3 which is the only other OU which is expected to be affected by this removal action.

**Action:**

The document has been revised as noted in the response.

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

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to discuss all potential alternatives for OUS 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.

**Response:**

Section 2.4 has been revised to reflect that the alternatives being considered are those established in the RI/FS Site - Wide Characterization Report.

**Action:**

The document has been revised as noted in the response.

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, OUS, or USTs would affect the schedule of this removal action and present the conclusion of this determination within this section.

**Response:**

The activities for the other Operable Units were investigated and it was determined that there is no foreseeable scheduling conflicts. Section 2.4 has been revised to reflect this.

**Action:**

The document has been revised as noted in the response.

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.

**Response:**

An investigation has been made into the possibility of encountering perched water in the proposed trench excavations. It is not anticipated that ground water will be reached at the maximum 3 foot depths proposed.

**Action:**

As noted in the response.

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.

**Response:**

A reference to Removal Action #17 has been added to this section also.

**Action:**

The document has been revised as noted in the response.

9. Section 4.2, Page 10: Is it possible for DOE to minimize disturbances by

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selecting smallest practicable pipe sizes and minimum pipe depths because of the small drainage areas?

**Response:**

Standard engineering practices dictate the use of the smallest practicable pipe sizes and minimum pipe depths.

**Action:**

No action required.

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.

**Response:**

An additional figure has been added to better reflect those areas to be affected by this project. Construction drawings have been included to aid in presenting the effect of the proposed construction.

**Action:**

The document has been revised as noted in the response.

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.

**Response:**

Agree. All low level soils excavated during this removal action will be boxed and handled in accordance with Removal Action #17, "Improved Storage of Soil and Debris" Work Plan.

**Action:**

The document has been revised as noted in the response.

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.

**Response:**

No. If field screening indicates that a HSL and TCLP analysis needs to be performed, then a separate sample will be taken at that depth from an adjacent boring (within 12 inches).

**Action:**

The document has been revised as noted in the response.

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

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should be a more inexpensive and practical approach for DOE to take. Is this methodology required under the QAPP?

**Response:**

QA/QC blanks and rinseate blanks will be analyzed for VOAs only.

**Action:**

The document has been revised as noted in the response.

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.

**Response:**

Agreed. All soils will now be managed in accordance with Removal Action No. 17 Work Plan.

**Action:**

The document has been revised as noted in the response.

15. Attachment II, Section 1.2, Bullet: DOE needs to evaluate HSL concentrations in soils prior to their free release.

**Response:**

The evaluation of HSL concentrations is being made in the screening process. See response #14.

**Action:**

The document has been revised as noted in the response.

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.

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**Response:**

All soils will be managed in accordance with Removal Action #17, "Improved Storage of Soil and Debris" Work Plan.

**Action:**

The document has been revised as noted in the response.

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