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**OEPA COMMENTS ON WESTON REPORT: SITE
CHARACTERIZATION OF THE WASTE STORAGE
AREAS**

11/14/86

OEPA/DOE-FMPC

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LETTER



Ohio Environmental Protection Agency

Southwest District Office
East Fourth Street, Dayton, Ohio 45402-2086



(513) 449-6357

Richard F. Celeste, Governor

November 14, 1986

Mr. James Reafsnyder
Site Manager
DOE-FMPC
Post Office Box 398704
Fernald, Ohio 45239

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Dear Mr. Reafsnyder:

Listed below are specific comments on the Weston report: Site Characterization of the Waste Storage Areas. Additional comments may also be forthcoming as the document is reviewed by other staff. One general comment about this document is that "Part 1", the "Evaluation of the Current Situation," and "Part 2", the Work Plan, have been prepared without complete review of historical activities at the site. Examples that we note include the relocation of Paddy's Run away from Pit 3 in the early 1960's and NLO documents referring to "large tears" in the liner of waste pit 5. It is our opinion that the work plan will have to be modified to address these two points and any other historical activities that have occurred on site.

1. In the past, soil samples have consisted of a composite of 6 cores, 2 to 10 cm. deep. This may dilute contaminants and lead to erroneous conclusions.
2. The discussion on water quality on 2-36 is very brief and misleading. Typically groundwater from the Great Miami Buried Valley Aquifer is moderately to excessively hard with excessive levels of iron and objectionable amounts of sulfate.
3. Data gaps concerning regional groundwater flow must be addressed. Specific recommendations in the Geo-Trans report need to be carried out.
4. Section 2.6.3 (water use) is misleading because it states that the primary source of water for Hamilton County and Cincinnati is from the Ohio River; however, the Great Miami Buried Valley Aquifer has been petitioned as a Sole Source Aquifer for the region (this implies 50% usage of groundwater). Also local pumping is in the range of 33.9 million gallons per day.
5. Figure 3-5 should state that the caps for pits 1 and 3 have been breached by erosion and that pits 5 and 6 are still in use. Pit 6 receives "leachate" from pit 4.

*Received from
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6. Chapter 3 should include specific references from construction documents for the waste pit area i.e., perched groundwater, sand lenses, depth, etc., along with any history of repairs which have occurred.
7. When was the burn pit closed and what prompted closure? List types of materials disposed of in burn pit.
8. On page 3-20 it states that decant pipes were placed through the berms of the waste pits. Where was the decant liquid pumped to? Also, where was decant liquid from K-65 silos placed?
9. Specific types of cover material used need to be documented for all closed waste pits.
10. Cracking of concrete silos should be clearly stated on page 3-25 in the reasons given for providing an earthen embankment. Any estimate of material lost through these cracks should be also included.
11. Subsurface flow of approximately 2 gpm into the storm sewer may be a source of radionuclides. Sampling of the low flow conditions should determine if this is a problem.
12. Sampling of the Knollman shallow well identified 11.2 ppb TCE. The source of the TCE needs to be determined through further sampling. If it has possibly migrated from FMPC, then it should be stated on page 3-30.
13. The History of Response Actions should include:
 - a. Repairs of liner tears
 - b. Protective pumping schemes
 - c. Spill recovery
 - d. Construction of Bio denitrification and storm water retention basins.
 - e. Relocation of Paddys Run away from Waste Pit #3 or any other modification to Paddy's Run.
14. The lime pits should be included in the discussions on page 5-1.

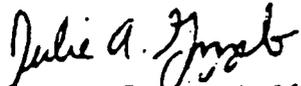
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15. The upgradient wells identified on page 5-2 are in a different aquifer and thus are of little value for comparison with down gradient wells. Shallow and deep wells should be installed in sand and gravel aquifers immediately north of the waste pit but south of where well #12 is located.
16. The sanitary landfill, coal pile, production area, chemical storage pads and the lime pits should be included as potential sources listed on page 7-1.
17. Pumping and subsequent discharges from Test well #1 shallow to Paddy's Run should be stated in the 4th paragraph on page 7-2 as potential sources of contamination in Paddy's Run.

If you have any questions, please contact me.

Sincerely,

for 

Graham E. Mitchell
Supervisor
Water Quality Monitoring
and Assessment

GEM:lmr

cc: Jack VanKley, CO
Steve Clough, USEPA, Region V