

3328

FINDINGS & ORDERS ORDER 5

05/27/87

OEPA/DOE-FMPC

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LETTER



Southwest District Office
7 East Fourth Street
Dayton, Ohio 45402-2086
(513) 449-6357

Richard F. Celeste
Governor

3328

Rick
DAVE B.

May 27, 1987

Re: FINDINGS & ORDERS
ORDER 5

Mr. Rick Collier
Environmental Engineer
U.S. DOE/FMPC
P.O. Box 398705
Cincinnati, Ohio 45239

Dear Mr. Collier:

The purpose of this letter is to comment on the work plan received on April 29, 1987, concerning Order 5. Tasks in the work plan were broad, so our comments/questions seek FMPC clarification on specific actions which will be taken to complete the three primary objectives.

A. Surface Water Leak Detection

1. According to the stormwater retention plans submitted with the PTI (Drawing No. 18B-1920-G-00350), underdrains for groundwater and leachate collection appear to be separate. If this is the case, separate or isolated flow data from the underdrains should provide the information necessary to determine leakage rates.
2. Water quality data from existing perimeter monitor wells and underdrain water should be collected to supplement task 2.
3. Identify what parameters will be sampled to make a source determination in task 2. Also, is dye commonly used for leak detection from lagoons? What other mechanism is available if dye testing is not successful?
4. The word acceptable should be deleted from task 3.
5. A SWRB inspection and installation report similar to that submitted for the biodegradation surge lagoon (letter dated 2/23/87) should supplement task 4.
6. The word excessive in task 5 is too general and should be deleted.

If leakage is documented in the findings of Tasks 1-4, FMPC should prepare a corrective action plan which comments on the feasibility of making liner repairs. If leakage is detected and the liner can easily be repaired - the repair should be made. If leakage is detected and repairs are difficult, Ohio EPA and FMPC will have to jointly evaluate the options available and their overall feasibility.

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B. Overflow of the Storm Water Retention Basin

1. The rainfall events which occurred during past overflow events should be identified with the TSS and flow data presented in task 1.
2. It is Ohio EPA's understanding that erosion control measures have not yet been implemented around the perimeter of the SWRB. We recommend riprap (or some comparable erosion control mechanism) be placed around the edge of the basin as soon as possible, to prevent further erosion, and so resuspension tests are representative of what is happening in the basin.
3. In a letter to Tom Winston, dated March 3, 1987 and titled "Results of Stormwater Retention Basin Overflow Monitoring", improved sampling techniques are recommended (Page 14) to adequately assess TSS removal and suspension. It is apparent that until adequate monitoring stations are built to test influent, effluent, and overflow, the validity of the samples and the assumptions made based on the results will be questionable. We suggest that the scope of this section be modified to focus on improvements which can be made to the first basin in conjunction with the construction of the second retention basin so the two basins, either in series or in parallel, achieve maximum settling of TSS.
4. What criteria is used to determine when the lift station pumps should be turned off and then on during a storm event? This study should try to minimize TSS in the overflow but consideration should be given to correlating overflows and diversions (via MH34) so the maximum amount of TSS and U are settled in the retention basin.
5. Is item 1 under Task 4 suggesting that the spillway be moved by the inlet or that an overflow weir or diversion be provided at the inlet so when the retention basin is full, "clean" stormwater could be directly diverted (to Paddy's Run or MH 175) to reduce the hydraulic turbulence?
6. Task 4 should consider modifying the basin so the outlet structure (effluent discharge to MH 175) is at the opposite end of the basin from the inlet structure.

Date Rec'd _____

Log A-574

File _____

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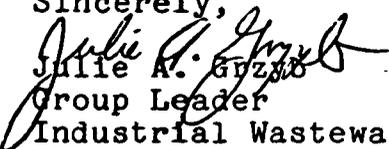
7. Section B should consider modifying the outlet structure and eliminating the spillway so overflows can be diverted to MH 175 and not to Paddy's Run. Such a structure may be more feasible after the second basin is completed and overflows are infrequent; however, modifications to the first basin will have to consider the best long term options to minimize impacts to Paddy's Run. | R1

C. Bypass of the Stormwater Retention Basin

This section is satisfactory.

Please modify the work plan to address our comments/questions outlined above. If you have any questions on our comments contact Kendra Dearth or me.

Sincerely,


Julie A. Guzzio
Group Leader
Industrial Wastewater

cc: Kendra Dearth, OEPA
Graham Mitchell, OEPA
Rich Bendula, OEPA
Tom Winston, OEPA
Jack Van Kley, Attorney Generals Office