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**REVISED SCRAP METAL PILES R.A.W.P.**

**06-01-92**

**OEPA/DOE-FN  
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LETTER**



State of Ohio Environmental Protection Agency

Southwest District Office

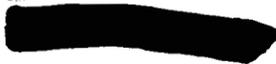
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George V. Voinovich  
Governor



June 1, 1992

RE: REVISED SCRAP  
METAL PILES R.A.W.P.

Mr. Jack R. Craig  
Project Manager  
U.S. DOE FEMP  
P. O. Box 398705  
Cincinnati, Ohio 45239

Dear Mr. Craig:

Listed below are Ohio EPA's comments on the Revised Scrap Metal Piles R.A.W.P. As stated in the previous version, this work plan fails to describe work and cannot be considered a time critical removal action.

General Comment

1. As stated in Ohio EPA's previous comment (2/20/92) on this work plan, insufficient detail is provided to make an acceptable work plan. The work plan must include more detail as to how the work will be completed and sampling conducted. DOE should have considered the requirements of a work plan when agreeing to the dates set forth in the Amended Consent Agreement. DOE needs to expedite the process of acquiring subcontractors for the various Phases of the proposed removal action, so that an adequate work plan can be submitted. If budgetary factors are the reason for these delays DOE should discuss this in the responses.

Specific Comments

1. Section 3.3: It is difficult to realize how DOE is considering this a time-critical removal action based upon the schedules proposed here. The schedules proposed herein support a non-time-critical removal action, thus requiring the completion of an EE/CA. DOE needs to expedite actions on this removal action and submit an adequate work plan.
2. Section 3.3: DOE has provided no justification for not initiating Phase IIA prior to 9/92. Detail as to how Phase IIA will be conducted should be provided within the work plan and activities under this phase should be initiated at the soonest possible date.
3. Section 3.3: DOE should have released the RFP for Phase IIB at the same time as the Phase I RFP. DOE needs to provide justification for its failure to release the Phase IIB RFP in a timely manner. DOE has known of the need to conduct this removal action since the summer of 1991, when

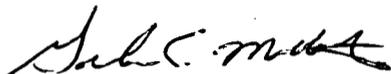
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PARTIAL ACTION RESPONSE

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the Amended Consent Agreement was negotiated. DOE's failure to release the Phase IIB RFP has delayed and will continue to delay activities under this removal action.

If you have any questions please contact Tom Schneider or me.

Sincerely,



Graham E. Mitchell  
Project Manager

GEM/bjb

cc: Jenifer Kwasniewski, DERR  
Tom Schneider, DERR  
Jim Saric, U.S. EPA  
Dennis Carr, WEMCO  
Lisa August, GeoTrans  
Tom Hahne, PRC  
Robert Owen, ODH