

R-027-207.3

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**CONDITIONAL APPROVAL FOR THE
UNCONTROLLED PRODUCTION AREA
STORMWATER RUNOFF WORK PLAN**

06/23/92

OEPA/DOE-FN

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LETTER

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State of Ohio Environmental Protection Agency

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Southwest District Office

40 South Main Street
Dayton, Ohio 45402-2086
(513) 285-6357
FAX (513) 285-6404

JUN 25 11 57 AM '92

George V. Voinovich
Governor

June 23, 1992

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

Dear Mr. Craig:

The purpose of this letter is to conditionally approve the Uncontrolled Production Area Stormwater Runoff Work Plan. The conditions for approval are that DOE address, to Ohio EPA's satisfaction, the comments listed below. Ohio EPA is very concerned about DOE's definition of mixed waste (Comment #6). This definition is clearly inappropriate and not consistent with past practices at FEMP.

SPECIFIC COMMENTS

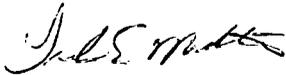
1. Table 1, pg. 5: The table should include Ohio Solid Waste ARARs. Please include OAC 3745-27-01(U); OAC 3745-27-05; ORC 3734.03, and ORC 3734.01(I).
2. Attachment 1, Section 2.0, pg. 1, last paragraph: In order to better comply with the third requirement listed in this paragraph, DOE should consider using HSL analysis rather than TCLP. Prior sampling detailed in the RSE shows a low probability of encountering RCRA soils, thus less need for TCLP data. HSL data will better suit the RI/FS effort and be more useful for determining soil disposition. Cleanup levels determined in the site RODs will most likely not be based upon TCLP levels but upon totals acquired through HSL analyses. If HSL concentrations suggested the presence of RCRA material, the soil could be containerized and sampled for TCLP. When considering cost and data usefulness, it would seem that initial analysis by HSL followed if necessary by TCLP would be appropriate.
3. Attachment 1, Section 2.0, pg. 1, last paragraph: Another requirement to be added to this list is "the characterization of the soils to determine the proper disposition of excess material."
4. Attachment 1, Section 4.0, pg. 2, last paragraph: Curbing areas shown in Plates C-8 and C-10 do not include any sampling locations. DOE needs to include sampling locations within the curbing areas if any soil will be excavated. Plate C-6, detailing design of curbs, suggests the curb will be excavated into the earth, supporting the need for sampling.

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5. Attachment 1, Section 4.0, pg. 3, first paragraph: Plate C-10 shows locations SP-39 through SP-42 lying within a trench drain rather than a proposed curbing, as it is suggested in the text. Please correct either the text or the Plate.
6. Attachment 2, Section 1.2, pg. 2, last bullet: Has DOE always used the <100 pCi/g uranium and <50 pCi/g thorium definition for hazardous waste not being a mixed waste? DOE needs to provide justification for determining mixed waste at these levels. DOE needs to consult with Ohio EPA RCRA staff concerning the use of such levels for mixed waste determinations.

If you have any questions about these comments, please contact Tom Schneider or me.

Sincerely,



Graham E. Mitchell
Project Manager

GEM/klj

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