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SOUTH PLUME PART 5 WORK PLAN

09/14/92

OEPA/DOE-FN
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LETTER
OU5

OhioEPA
State of Ohio Environmental Protection Agency
Southwest District Office
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[redacted]

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George V. Voinovich
Governor

September 14, 1992

Re: SOUTH PLUME
PART 5 WORK PLAN

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 South Plume Part 5 Work Plan. The conditions for approval are that DOE address, to Ohio EPA satisfaction, the comments listed below:

1. Sec. 5.2.1, page 7, para. 1: Ground water samples should be analyzed for volatile organic compounds (VOC's) and uranium. The presence/extent of VOC's from the Paddy's Run Road Site (PRRS) is a major issue concerning the treatability of the ground water. Sampling the monitoring wells for VOC's will provide valuable information concerning the potential impact of these VOC's.

2. Sec. 5.2.2, page 8, para. 4: All hydropunch samples should be analyzed for uranium and VOC's. See comment #1.

3. Sec. 5.2.3, page 9, para. 2: Monitoring wells should be sampled after they have been properly developed.

4. Sec. 5.2.5, page 9, para. 1: The FEMP must maintain the Great Miami River discharge within the NPDES permit limits. As such, FEMP is responsible for determining the potential impact of the PRRS plumes on the ground water interceptor system.

5. Sec. 5.2.5, page 10, para. 2: While soil vapor studies can potentially indicate the presence of VOC's in the ground water, there is not always a direct correlation. Soil gas should be treated only as a preliminary screening tool to be used to locate hydropunch, piezometer, or monitoring well locations.

6. Sec. 6.3, page 12: The number and locations of piezometers should be updated to include Ohio EPA's comments on the pump test work plan.

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7. Sec. 6.7, Enclosure 4, para. 1: The Photovac Tip listed here as the "portable organic vapor detector" which will be used for the soil gas study is not a Foxboro 126 Organic Vapor Analyzer. Section 5.2.5, page 10, para. 3 states that a Foxboro 126 OVA will be used for the soil gas study.

   Ohio EPA's experience with the TIP shows that is unreliable and, therefore, unsuitable for use in the soil vapor study. Information on the Foxboro 126 OVA should be sent to Ohio EPA for review before it can be considered for the project.

8. Sec. 6.7, Enclosure 4, para. 5: The FEMP cannot simply use any meter that they wish for the study. Different organic vapor meters have different properties. The exact make and model should be agreed upon prior to the study.

9. Sec. 6.7, Enclosure 4, para. 5: The organic vapor meter should be calibrated in the field every time the meter is shut off, when the atmospheric conditions change (temp., humidity, etc...), and periodically as the equipment is used in order to compensate for power drain and dirt buildup on the lamp. This means that the field crew will need to have the calibration kit, will have to know how to use it, and will have to use it several times during the day. Calibration records should be taken in the field by the field crew every time the organic vapor meter is calibrated. All details, including, but not limited to, temperature, time, span (or equivalent), weather conditions, and condition of the meter should be recorded.

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

Sincerely,

Graham E. Mitchell
Project Manager

GEM/yrc

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