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**OHIO EPA COMMENTS ON WASTE PIT AREA
CONTAINMENT IMPROVEMENT REMOVAL
ACTION (#22) WORK PLAN**

09-22-92



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

September 22, 1992

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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 comments on the Waste Pit Area Containment Improvement Removal Action (#22) Work Plan.

1. Section 3.1.2, pg. 3-6, last paragraph: DOE should avoid using materials which can not be washed or treated (e.g. asphalt). The use of such materials generates wastes which will not be treatable and takes an action which may not be consistent with the final remedy. The use of washable materials such as aggregates is preferred.
2. Section 3.3.2, pg. 3-8, 4th bullet: DOE must include a description of the fill soil source as well as any criteria (e.g. contaminant concentration, etc.) used for determining adequateness of the fill material.
3. Section 3.3.2, pg. 3-10, 3rd paragraph: DOE should use water from a potable water supply for these activities.
4. Section 4.2, pg. 4-2: Unless the design effort has already started, DOE will not meet the required field work deadline of six months. The document fails to provide the date of issuance for the Action Memorandum but it must have been issued before the RSE thus requiring field work before December, 1992. DOE must expedite its efforts to meet this deadline.
5. Section 7.2, pg. 7-1, last paragraph: Is the radiological survey technique described here the same as that used in for the Sewage Treatment Plant Incinerator Soils Removal Acaiton? If not, DOE should use the survey technique implemented in the Incinerator Soils RA survey.
6. Section 7.3, pg. 7-4, 1st paragraph: DOE should consider the use of pre- and post-construction surface water sampling for evaluating the effectiveness of this removal action.

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7. Section 7.4, pg. 7-4, 4th paragraph: Radiological analyses, in addition to hazardous substance analyses, of the soil are necessary to determine the proper disposition of the soils. DOE should incorporate within the revised work plan radiological sampling of the excess material.
 8. Appendix C: Include state ARAR: Ohio Solid Waste OAC 3745-27-02(UU); OAC 3745-27-05; ORC 3734.03; ORC 3734.01(I) since solid waste may be generated (contaminated soil); proposed runoff control rules, which will be ARARs when finalized, OAC 1511 and ORC 307.79.

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

Sincerely,



Graham E. Mitchell
Project Manager

GEM/ycrc

cc: Jenifer Kwasniewski, DERR
Tom Schneider, DERR
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