

**RESPONSE TO OHIO EPA COMMENTS ON
REMOVAL ACTION NO. 16 COLLECT
UNCONTROLLED PRODUCTION AREA
STORMWATER RUNOFF**

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RESPONSE TO OHIO EPA COMMENTS
REMOVAL ACTION NO. 16 WORK PLAN
COLLECT UNCONTROLLED PRODUCTION AREA STORMWATER RUNOFF

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General 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).

Response:

These ARARs have been incorporated into Table 1 as requested. As per the telephone conversation with Tom Schneider of your agency, OAC 3745-27-01(U) has been changed to OAC 3745-27-01(UU).

Action:

The document has been revised as noted in the response.

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 in necessary by TCLP would be appropriate.

Response:

HSL data would be very good information to have on all collected samples. However, the scope of this project makes such analytical cost prohibitive. If additional data is needed in the future, the construction of this collections system is such that there would be no problem in gathering additional samples.

Action:

No action taken.

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."

Response:

The excess material disposition will be added to Section 2.0.

Action:

The document has been revised as noted in the response.

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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.

Response:

Soil will be excavated in the areas of proposed curbing. Additional sampling points have been added in the curbing areas.

Action:

The document has been revised as noted in the response.

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.

Response:

The sample points are actually located in a trench drain rather than proposed curbing. The text has been corrected to reflect this.

Action:

The document has been revised as noted in the response.

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.

Response:

The levels of > 100 pCi/g for uranium and > 50 pCi/g for thorium were obtained from the Federal Register, Volume 46, No. 205, Friday, October 23, 1981. The levels are those limits suggested by the NRC for burial in areas zoned for industrial use.

Action:

No action taken.