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**OHIO EPA COMMENTS ON THE IMPROVED  
STORAGE OF SOIL AND DEBRIS R.A.W.P.**

10-05-92

**OEPA/DOE-FN  
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LETTER**



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George V. Voinovich  
Governor

October 5, 1992

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

Dear Mr. Craig:

Attached are Ohio EPA comments on the Improved Storage of Soil and Debris R.A.W.P. DOE has addressed most of Ohio EPA's earlier comments but several issues still need to be resolved.

If you have any questions about these comments 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

(JANKL(RS))  
Action Response  
to DOE-2524-92  
(4891)

OEPA COMMENTS ON  
IMPROVED STORAGE OF SOIL AND DEBRIS  
REMOVAL ACTION WORK PLAN

General Comments

1. It is still unclear as to how or when soil placed in the "controlled stockpiles" will be remediated. The Amended Consent Agreement (ACA) defines the specific operable units with some detail followed by the statement, "and soil within the operable unit (OU) boundary as approved in the RI/FS work plan addendum." The ACA suggests a "controlled stockpile" should be addressed by the specific operable unit in which boundary it lies. The Improved Storage of Soil and Debris (ISSD) RAWP suggests several possibilities. The ISSD references remediation under OU3, OU5 and the site-wide residual risk assessment with no clear resolution. Since it is obvious the "controlled stockpiles" will contain concentrations requiring remediation, it is unacceptable to use the residual risk assessment to determine remediation. Additionally, since backfilling with or disposal of contaminated soil should not occur within an OU following the completion of its respective RI/FS and ROD, it would seem the ACA provides the best direction for remediation of "controlled stockpiles." DOE must clearly define and justify the final format for remediating the "controlled stockpiles" as well as the materials placed in the improved storage facilities.
2. Ohio EPA still believes as stated in previous comments that presence of non-radiological contaminants, at concentrations below hazardous waste criteria, within stockpiled soils is a concern. The use of this material for backfill in areas not containing elevated levels of specific metals, semi-volatile organics or volatile organics may result in the addition of new contaminants to the area. It will be the responsibility of DOE to track and incorporate these potential new contaminants into each OU RI/FS as they are deposited within the OU.

Specific Comments

1. Section 3.1.1, pg. 3-5, 3rd paragraph: The first and last sentence of this paragraph appear to be contradictory. The first sentence says off-site soils and debris are not addressed in the work plan, while the last says it will be handled in accordance with the work plan. It is important to clarify how off-property materials will be handled. The need for this direction is emphasized by the discovery of contaminated soil/debris at the outfall along the Great Miami River. The disposition of these types of materials should be addressed by this RAWP.

2. Table 3-1, pg. 3-9, Controlled Stockpile: The 5 pCi/g for thorium and radium discussed here is not coordinated with the rest of the text. Please correct.
3. Section 3.3: This "buildover policy" appears different than the "buildover criteria" used in the Waste Pit Area Stormwater Runoff Control RAWP. Are these different policies or does the one discussed in the ISSD RAWP replace the "buildover criteria?" The document should state specific procedures for future buildover or reference the current SOP for buildover policy.
4. Figure 3-2 & 3-3, pgs. 3-16 & 3-17: The "controlled stockpile" soils must be addressed under a specific operable unit(s). DOE may not put-off the assessment and remediation of these stockpiles until the site-wide residual risk assessment. The document should detail proposed locations of the "controlled stockpiles" and the specific operable unit(s) which will address them. See General Comment #1 above.
5. Table 3-3: The statements under Phase II are not in agreement with Figure 3-3 which references final disposition based upon the site-wide risk assessment. Additionally, the disposition of soils located within specific OU's under the OU5 ROD is not in agreement with the ACA.
6. Figures 3-4 & 3-5: DOE fails to state which operable unit will address these wastes within its ROD. This must be clarified so final responsibility for the wastes is set.
7. Section 3.9, pg. 3-34, 3rd Paragraph: As stated in previous OEPA comment #24 on the 3/25/92 version of this document, reference to the residual risk assessment should be removed. DOE's response to comment #24 said the sentence would be removed as well as referencing a Section 3.10 which doesn't exist. The assessment and remediation of soils in controlled stockpiles must be conducted under the operable unit framework.
8. Table 6-3, pg. 6-8, Class Enrichment Code, Additional Information...: Additional information logged in must include the concentration of all hazardous substances. The risk from these constituents is cumulative and must be assessed. Additionally, it will be important to know what new contaminants DOE will be adding to an area when the stockpiled soil is used for backfill.

9. Section 7, pg. 7-1, 1st Paragraph: When will data gathered during the removal action sampling be input and added to the MEF? It will be essential to include this data as it will likely provide more detail and information concerning the contaminants present in the stockpiled soil.
10. Section 7.2.2, pg. 7-3, 2nd Paragraph: Is this the same procedure for field assessment of radionuclides as was used during the Sewage Treatment Plant Incinerator Contaminated Soils Removal Action? Sampling conducted under that removal action suggests the procedure used therein is the only reliable field assessment for the 100 pCi/g limit. If these are not the same, DOE should use the methods describe in that removal action for all future field measurements.
11. Section 7.3.1, pg. 7-6, 4th paragraph: Averaging over a 100 square meter area will potentially over or under estimate the actual soil concentration, if the area to be excavated is actually smaller than 100 square meters. DOE should only average over the area to be excavated when the area is smaller than 100 square meters.
12. Attachment B: The table should include Ohio Solid Waste ARARs, since soils contaminated with hazardous substances at levels below hazardous waste concentrations are considered solid waste. Please include OAC 3745-27-01(UU); OAC 3745-27-05; ORC 3734.03; ORC 3734.01(I).