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**OHIO EPA COMMENTS ON THE APPROACH TO  
REUSING THE O.U. 3 WORK PLAN ADDENDUM**

10-05-92

**OEPA/DOE-FN**

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**LETTER**



State of Ohio Environmental Protection Agency

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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:

Listed below are Ohio EPA comments on the approach to reusing the O.U. 3 Work Plan Addendum and an Example Sampling and Analysis Plan for Component 39A. Overall this approach seems much improved and recognizes the limited remedial options for O.U. 3.

General Comments

1. DOE should mention that "lessons learned" through removal actions such as Plant 1 Ore Silos will be integrated into the O.U. 3 Workplan.
2. Since the definition of this operable unit does not include surrounding soils, DOE should discuss the possibility of contaminants being transferred to O.U. 5 during response actions. Additional characterization in O.U. 5 may be necessary.

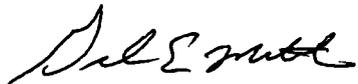
Specific Comments

1. Section 2.2 Page 9 2nd paragraph. Change second sentence to read, "Off-site risks during remediation will be minimized by achieving compliance with ARARs through the use of engineering controls and monitoring at the site boundary".
2. Section 3.2 Page 16 1st full paragraph - In the fourth line "ARARs" should be "areas".
3. Section 3.4 page 17. Because of its porous nature transite should be more likely to absorb radiological and chemical contamination, not less likely.
4. Section 4.2 page 21 line 6. Add number (7) "evidence of chemical erosion and degradation."

Mr. Jack R. Craig  
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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