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**CONDITIONAL APPROVAL PILOT PLANT SUMP
REMOVAL ACTION WORK PLAN**

11/12/92

**OEPA/DOE-FN
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LETTER**



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

November 12, 1992

RE: CONDITIONAL APPROVAL
PILOT PLANT SUMP R.A.W.P.

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 Pilot Plant Sump Removal Action Work Plan. The conditions for approval are that DOE address, to Ohio EPA satisfaction, the comments listed below:

GENERAL COMMENTS

- 1. There is a concern, by Ohio EPA, that the sump is serving as a collection point for contaminants flowing through the piping. DOE feels that the volume of liquid contained in the piping system and that which has been collected by the sump is consistent. Upon completion of the sump's final pump out, DOE should allow time to verify that additional liquids are not entering the pump (greater than 500 gallons). The information, which may provide valuable insight as to the source of contamination, will then be addressed in the final remediation of the Pilot Plant.
2. All records concerning RA work activity on this HWMU should be maintained for reference within the context of the RCRA closure plan.

SPECIFIC COMMENTS

- 1. Section 1.0, Page 1-1, indicates the facility does not intend to close the unit under RCRA at this time, and that the RCRA closure plan will be submitted on or before May 5, 1994. This information is in conflict with information contained in Attachment 5 (ARARs) Section 4.1.3, pages 4-5, which indicates the RCRA closure requirements are ARARs and states that the Closure Plan Information and Data is included in the work plan to address the RCRA requirements.
2. Section 3.4, Table 3.1, Schedule: Why does it take two months to "select removal organization"? What is involved in this process?
3. Section 4.8, Page 4-14: If gross contamination of soil still exists after excavation, DOE should consider additional excavations prior to backfilling. DOE should keep their options open.

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4. Section 6.2.2, Table 6-3: Toluene should be added as an analyte in soil analysis. It is commonly present as a contaminant of xylenes.
5. Section 6, Page 6-8, 7th line, ". . . to detect pressure of volatile . . ." The use of the word pressure is inappropriate for the sentence-- might have meant presence.
6. DOE Comment #18: The corrected inconsistencies were not incorporated into the document.
7. Attachment 5, Section 4.1.3, pages 4-3, proposes that the sump and drainage pipe need not be managed as hazardous waste. This position is based upon the concept of "RCRA empty" as applied to containers. OAC 3745-50-10(A)(17) defines "Container" to mean "any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled." Therefore, the term "container" and the "RCRA empty" concept are not applicable to the sump and drainage pipe.

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

Sincerely,



Graham E. Mitchell
Project Manager

GEM/klj

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