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**APPROVAL OF THE OU 5 WORK PLAN
ADDENDA FOR PLANT 1 PAD**

11/24/92

**OEPA/DOE-FN
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LETTER**



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

November 24, 1992

[Redacted]
U-007-365.20

Mr. Jack 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 O.U. 5 Work Plan Addenda for Plant 1 Pad, Southeast Quadrant of the Production Area, Fire Training Area, KC-2 Warehouse and Electrical Substation, and K-65 Slurry Line and Clearwell Line. The conditions for approval are that DOE address, to Ohio EPA satisfaction, the comments listed below:

RESPONSE TO COMMENTS

1. Comment #29 (Original OEPA comment #2): DOE's response to comment #19 fails to address a number of points discussed in Ohio EPA's comment. Integration with the RCRA program was not addressed nor was the fact that the piezometers were intended for one sampling event but will be used for at least three. Additionally, DOE must define the circumstances or conditions which they believe will necessitate replacing PVC with stainless steel.
2. Comment #47 (Original OEPA comment #3, K-C2 warehouse etc.): In DOE's response they state that field screening technologies would be used for the selection of sampling locations. The use of field screening technologies is not discussed within the revised work plan. Ohio EPA still believes that both PCB and radiological field screening would enhance this sampling effort.

WORK PLAN ADDENDA

1. Section 1.2: DOE should have done a better job of integrating information gained from the Plant 1 Pad Removal Action into this work plan. The data gained should have been included in the discussion and any additional data gaps should be addressed. One would think that the amount of data from the RA would have addressed some concerns or possibly created new ones to be addressed, yet no less or more work is proposed.
2. Section 2.3, 4th paragraph: DOE should provide a better description of buildover sampling results. Additionally, it should be noted that the buildover criteria are not final remediation concentrations and may not

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be low enough. The goal of the investigation is to determine the extent of contamination, not to determine that contamination is below the buildover criteria.

3. Appendix B, Table A-4: Define "N."
4. Appendix B, Figure 3: Locations 238 and 239 are not included in the figure. Please revise.

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

Sincerely,



Graham E. Mitchell
Project Coordinator

GEM/klj

cc: Jenifer Kwasniewski, DERR, CO
Tom Schneider, DERR, SWDO
Jim Saric, U.S. EPA
Dennis Carr, WEMCO
Lisa August, Geotrans
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Robert Owen, ODH