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**RESPONSE TO COMMENTS ON REMOVAL  
ACTION 24 - PILOT PLANT SUMP REMOVAL**

11/22/92

**DOE-0617-93  
DOE-FN/EPA  
7  
LETTER**



P-031-208.3

**Department of Energy**  
**Fernald Environmental Management Project**  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705  
(513) 738-6357

DEC 22 1992  
DOE-0617-93

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Mr. James A. Saric, Remedial Project Director  
U.S. Environmental Protection Agency  
Region V - 5HRE-8J  
77 W. Jackson Boulevard  
Chicago, Illinois 60604-3590

Mr. Graham E. Mitchell, Project Manager  
Ohio Environmental Protection Agency  
40 South Main Street  
Dayton, Ohio 45402-2086

Dear Mr. Saric and Mr. Mitchell:

**RESPONSE TO COMMENTS ON REMOVAL ACTION 24 - PILOT PLANT SUMP REMOVAL**

This letter transmits, for your review and approval, the responses and actions addressing each of the comments received from the United States Environmental Protection Agency and Ohio Environmental Protection Agency on the work plan for Removal Action No. 24.

After your approval of these responses and their associated actions, the final revised Removal Action Work Plan for Pilot Plant Sump will be submitted to you.

If you or your staff have questions or comments, please contact Anand Shah at 513-738-6156.

Sincerely,

Jack R. Craig  
Fernald Remedial Action  
Project Manager

FN:Shah

Enclosure: As stated

cc w/enc.:

W. E. Murphie, EM-42, TREV  
K. A. Hayes, EM-424, TREV  
J. Benetti, USEPA-V, AT-18J  
B. Barwick, USEPA-V, 5CS-TUB-3  
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AR Coordinator, FERMCO

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**U.S. EPA AND OHIO EPA COMMENTS  
AND DISPOSITION RECORDS**

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**PILOT PLANT SUMP  
REMOVAL ACTION NO. 24 WORK PLAN  
[ABANDONED SUMP WEST OF PILOT PLANT]**

**Fernald Environmental Management Project**

**December 1992**

FINAL COMMENT DISPOSITION RECORD

4007

Document: Pilot Plant Sump Removal Action #24 Work Plan

Reviewer: Ohio EPA

#	COMMENT	PROPOSED DISPOSITION
<b>GENERAL COMMENTS</b>		
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.	DOE will routinely monitor the status of on-going drainage into the sump until the removal actions are initiated. Liquid levels before and after the pump outs conducted to date have stabilized at a depth of approximately 36 inches below grade. The fact that the liquids stabilize at this level, rather than continue to rise, is an indication that removal of the sump and capping the drain line will not adversely effect the source of these liquids.
2	All records concerning RA work activity on this HWMU should be maintained for reference within the context of the RCRA closure plan.	Agree. See disposition of US EPA specific comment #1.  Affected page 3-4.
<b>SPECIFIC COMMENTS</b>		
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.	The text will be modified to reflect this change. The revisions will indicate that a CPID will be submitted to OEPA after completion of the removal activities (on or before May 5, 1994) at which time the facility will demonstrate compliance with the RCRA closure standards.  Affected pages: 9-11, 9-19, 9-20, 4-5, 4-11.
2	Section 3.4, Table 3.1 Schedule: Why does it take two months to "select removal organization"? What is involved in this process?	This time interval is based on the potential for competitively selecting an off site commercial firm and preparing federally mandated US DOE safety and operational documentation.  Affected page: 3-5.

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Document: Pilot Plant Sump Removal Action #24 Work Plan

Reviewer: Ohio EPA

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.	The stated volume of soil excavation is for planning purposes and allows for some degree of discretion during the removal. Text will be clarified.  Affected page: 4-14.
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.	Toluene will be added.  Affected pages: 6-4, 6-9 (Table 6-3).
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.	Correction will be made as indicated.  Affected page: 6-8.
6	DOE Comment #18: The corrected inconsistencies were not incorporated into the document.	Correction will be made as directed. "The temporary sump is 9 feet long by 2 feet in diameter....".  Affected page: Attachment 1, 1-1.
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.	The text regarding the "RCRA empty container rule" will be deleted because the Sump and its ancillary equipment are not "containers". Nevertheless, once treated pursuant to the hazardous debris treatment standards (and not exhibiting a hazardous characteristic) under 40 C.F.R. 268.45 (57 Fed. Reg. 37194, August 18, 1992), the sump and its ancillary equipment will not be subject to RCRA regulation.  Affected pages: 9-16, 4-3, 4-4 and 4-9.

FINAL COMMENT DISPOSITION RECORD

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Document: Pilot Plant Sump Removal Action #24 Work Plan

Reviewer: U.S. EPA

#	COMMENT	PROPOSED DISPOSITION
GENERAL COMMENTS		
1	<p>The revised removal action (RA) work plan has been substantially revised to address U. S. Environmental Protection Agency (EPA) comments. The approach presented in the revised work plan is to remove the tank; cap any connecting piping; conduct sampling of subsurface soils and residual sump contents; remove a limited amount of contaminated soil; internally inspect pilot plant drain lines; and integrate any study of residual contamination of subsurface soil and ground water into the operable unit (OU) 5 remedial investigation and feasibility study (RI/FS). Although this approach may be sound, the revised work plan does not provide for any EPA input should the RA identify sump-related contamination outside the scope of the revised RA work plan. After this phase of the RA is implemented, the U.S. Department of Energy (DOE) should submit a report to EPA that allows the agency to evaluate whether further remediation is necessary under this RA.</p>	<p>See proposed disposition of specific comment number 1 below.</p>
SPECIFIC COMMENTS		
1	<p>Section 3.4, Page 3-5, Paragraph 3. This section and Table 3-1 does not include a final report. DOE should include a final report that will require approval by EPA. Also, the text should indicate that further phases of activity are possible under the RA, depending on EPA's evaluation of the final report.</p>	<p>The reference section and table will be revised to indicate that a final report will be prepared within 2 months of completing field activities.</p> <p>Affected pages: 3-4, 3-5, Table 3-1.</p>
2	<p>Table 6-4, Page 6-10. Table 6-4 incorrectly references Table 6-3 for the analytical procedure. The reference should be to Table 6-2.</p>	<p>Table 6-4 will be revised to reference Table 6-2 for ASL D analyses and Table 6-3 for ASL C analyses.</p> <p>Affected pages: 6-10 to 6-12.</p>

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