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**COMMENTS ON THE SAMPLING AND ANALYSIS  
PLAN FOR THE RI/FS WORK PLAN ADDENDUM  
OPERABLE UNIT 2**

**OEPA/DOE-FN**

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LETTER**



State of Ohio Environmental Protection Agency

**Southwest District Office**

40 South Main Street  
Dayton, Ohio 45402-2086  
(513) 285-6357  
FAX (513) 285-6404

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George V. Voinovich  
Governor

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March 22, 1993

Mr. Jack R. Craig  
Project Manager  
U.S. DOE FEMP  
Cincinnati, Ohio 45239-8705

Dear Mr. Craig:

Attached are Ohio EPA comments on the Sampling and Analysis Plan for RI/FS Work Plan Addendum Operable Unit 2, March 1993. If you have any questions about these comments please contact Tom Schneider or me.

Sincerely,

Graham E. Mitchell  
Project Manager

TAS

cc: Jenifer Kwasniewski, DERR  
Tom Schneider, DERR  
Jim Saric, U.S.EPA  
Lisa August, Geotrans  
Jean Michaels, PRC  
Robert Owen, ODH

OEPA COMMENTS ON  
OU2 WPA SAP

General Comments

1. The SAP fails to relate that the Lime Sludge Ponds are Hazardous Waste Management Units. DOE must recognize the implications of this fact and ensure that adequate sampling is conducted to complete the Remedial Investigation and Feasibility Study for these units.

Specific Comments

1. Section 3.1.5: Additional detail should be provided as to the methodology of collecting wipe samples for full HSL and full RAD (e.g., volume of sample/wipes required, surface area to be wiped, etc.).
2. Table 8-10: The table fails to describe wipe samples that are to be collected in the South Field. The table should be revised to include wipe samples.
3. Section 8.3.4, 8.3.5: These sections describe the homogenization of soil samples prior to placement in sample jars. It is unacceptable to homogenize VOC soil samples. VOC sample containers should be filled prior to any mixing of soils. DOE must correct the text and halt such activities in the field, if ongoing.