

4531

*OHIO EPA COMMENTS ON THE O. U. 5 PSP FOR THE
SNAPSHOT MONITORING WELL SAMPLING AND
SURFACE WATER AND SEDIMENT SAMPLING*

06/17/93

OEPA/DOE-FN

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COMMENTS



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

June 17, 1993

Mr. Jack R. Craig
Project Manager
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Craig:

Attached are Ohio EPA Comments on the O.U. 5 PSP for the Snapshot Monitoring Well Sampling and Surface Water and Sediment Sampling. If you have any questions on these comments please contact Tom Schneider or me.

Sincerely,

Graham E. Mitchell
Environmental Manager

GEM/mlf

- cc: Jenifer Kwasniewski, DERR
- Tom Schneider, DERR
- Mike Proffitt, DDAGW
- Jim Saric, U.S. EPA
- Dennis Carr, FERMCO
- Lisa August, Geotrans
- Jean Michaels, PRC
- Robert Owen, ODH

(YERACE(P)
PARTIAL
ACTION RESPONSE
TO DOE-1940-93
(4317)

OHIO EPA COMMENTS

General Comments

1. DOE has failed to provide justification for the analytical suites chosen for ground water, surface water and sediment sampling. It is unclear why contaminants detected during previous sampling events were not included in the snapshot (e.g., Sr-90, etc.). A basic reason for conducting this sampling event is that a number of locations have not been sampled for the full suite of contaminants. This presents a problem when a contaminant is detected at one location but not sampled for at locations immediately surrounding it.
2. The work plan must include a figure(s)/plate detailing the locations of existing monitoring wells and highlighting those wells being incorporated into the snapshot sampling. Without such a figure, it is difficult if not impossible to evaluate DOE's selection of monitoring wells for inclusion. The necessity for such a map is further supported by the lack of text within the work plan describing the process of selection DOE used. A discussion of the selection process should be incorporated into the text.
3. The snapshot monitoring program does not include any kind of colloid investigation of site ground water. The nature of colloidal transport in the ground water is critical to the goals of the RI in that it may dramatically affect the determination of the nature, rate, and extent of the migration of contaminants in the ground water.

The snapshot monitoring program should be modified so that colloidal transport is adequately characterized. The work plan should be modified to include this study and submitted to Ohio EPA for approval.

Specific Comments

1. Section 3.2, pg. 5: It is unclear the selection process DOE used for choosing sampling locations. DOE should include W1, ASI-11, and ASI-12 in the sampling or provide sufficient justification for their exclusion. Ohio EPA assumes that DOE is planning to use Great Miami River background concentrations to compare results. This should be stated in the work plan.
2. Section 3.2.1, pg. 5: DOE should provide a justification for excluding the Great Miami River from sediment sampling.
3. Section 3.3.1, pg. 9: DOE should sample 2000 & 3000 series wells in the vicinity of the sewage treatment plant, waste pits, and K-65 silos for Tc-99, since Tc-99 has been detected in the perched ground water, waste pits, and decant sump respectively. DOE should discuss the grounds for not including all contaminants previously detected within the

analytical suite.

4. Section 3.3.2, pg. 9: DOE should sample surface water locations for Tc-99. Previous sampling has detected Tc-99 in multiple surface water locations. DOE should discuss the basis for not including all contaminants previously detected within the analytical suite.
5. Section 3.3.3, pg. 9: DOE should describe the reasoning for not analyzing sediment samples for pesticides and PCBs.
6. Table 7-1, pg. 18: Appendix K of the SCQ should be added as a reference document for decontamination for both ground water and surface water sampling. Section 6.8 of SCQ simply refers the reader to Appendix K for details on decontamination.
7. Section 7.3, pg. 17: A subsection providing the "proposed disposition methodology" for unused soil cores is not included as suggested by the last sentence on the page.
8. Section 7.3.1, pg. 18: The fact that DOE has not pre-determined which wells generate potential RCRA waste purge water is disconcerting. If DOE has conducted a sufficient review of historical data for selecting wells for sampling, such a review should also define which wells will likely generate RCRA waste. DOE must make this determination prior to sampling wells.
9. Section 7.3.2, pg. 18: Appendix K of the SCQ does not specifically address contact waste. DOE should provide a more detailed discussion of contact waste handling and disposition or provide a more specific reference to the SCQ.
10. Table A-1, pg. A-2: The table should be footnoted to describe which removal actions and OU5 work plan addendum are/is being used for the snapshot sampling.
11. Table A-1, pg. A-7: DOE should sample monitoring wells 1442 and 1448. Significant perched ground water contamination exists in the area of the STP justifying sampling of these wells.
12. Table A-1, pg. A-10: DOE should sample monitoring well 2094. The wells placement is within the south plume and within the Paddys Run Road Site plume.