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**OHIO EPA COMMENTS ON THE PSP FOR THE
PILOT PLANT DRAINAGE DITCH SEEP AND
SURFACE WATER INVESTIGATION**

07/08/93

OEPA/DOE-FN

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COMMENTS

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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

July 8, 1993

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

Dear Mr. Craig:

Listed below are Ohio EPA comments on the PSP for the Pilot Plant Drainage Ditch Seep and Surface Water Investigation:

1. Section 2.1, pg. 4, 4th paragraph: Additional detail should be provided as to the extent of sampling completed at ASIT-010. Detail should include whether the location was sampled for full HSL and Rad under the RI/FS program. If so, the contaminants detected should be included. This data would be useful in determining if it is actually necessary to sample all the seeps with 20 ug/l of uranium as well as the three surface water locations for full HSL. If previous data are available and suggest no organic contaminants are present, then DOE may wish to reconsider sampling for organics and focus primarily upon inorganic and radionuclide contaminants. If sampling was not conducted for the full RAD, then the three surface water locations, at a minimum, should be sampled for full Rad as listed in TAL 50.03.16 C on page A-5.
2. Table 2-3: The 3/10/92 elevated concentration of fecal coliform, which exceeds water quality criteria, should be considered in the evaluation of potential source(s) for contamination present within the stream.
3. Section 3.0, pg. 8: Should the seeps prove to be not highly contaminated, the proposed work will not have met the objective of determining the source of contamination to the stream. If the seeps are not the source of contamination, additional work should be conducted to further evaluate potential upstream source areas (i.e., pilot plant area).
4. Section 3.1, pg. 8 & 9: Infiltration of surface water along the reach of the stream, if present, will affect DOE's ability to determine the flow contribution of the seeps. DOE should consider this during its evaluation of data from the study.

(VERACE/P)
PARTIAL
ACTION RESPONSE
to DOE-2185-93
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5. Section 3.1., pg. 9: An expanded list of radionuclide analyses would be helpful in potential source determinations as well as determine the nature of contamination present. DOE should expand the radiological parameter list. As stated previously, DOE may wish to reconsider the analyses for organic contaminants within the seeps, if previous data justify it.
6. Section 3.1.3, pg. 11: DOE should consider the installation of a permanent weir system. The weir system may be useful in future monitoring of stream conditions. Additionally, DOE is more likely to achieve a good seal around a permanently (cemented in) installed weir. Good seals around the weirs are essential to determining the contribution of seep flow to the stream.
7. Section 3.3, pg. 13: It is unclear as to the reasoning for not sampling W-1 for full radiological analyses. These data are essential for the RI/FS. DOE should provide justification for exclusion within the text or include full Rad analyses.

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

Sincerely,



Graham E. Mitchell
Project Manager

GEM/bjb

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