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OHIO EPA COMMENTS ON THE PSP FOR SURFACE AND SUBSURFACE SOIL SAMPLING INVESTIGATION

07/26/93

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COMMENTS
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AIR

JUL 27 10 15 AM '93

George V. Voinovich
Governor

July 26, 1993

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

Dear Mr. Craig:

Attached are Ohio EPA comments on the Project Specific Plan for Surface and Subsurface Soil Sampling Investigation.

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

Sincerely,

Thomas A. Schneider
for

Graham E. Mitchell
Environmental Manager

TAS

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

(Mitchell (K)
Letter regarding
to 5-1916
(6372)

OHIO EPA COMMENTS
ON
PSP FOR SURFACE AND SUBSURFACE SOIL SAMPLING INVEST.

1. Section 3.0, pg 2: It is standard practice to not collect VOC samples from soils <0.5 feet, since such compounds quickly volatilize from these soils. DOE should reconsider its sampling plan with regard to collecting VOC samples from this interval. DOE should consider collecting VOC samples from below the 0.5 feet mark at shallow soil sampling locations. Shallow borings and deep borings should only be sampled for VOCs at intervals below the 0.0 to 0.5 interval.

2. Section 3.1.1, pg. 3: The section does not address the numerous piles of soil and debris which exist within the northwest quadrant between the production area and the waste pits. DOE should incorporate a sampling program to evaluate the nature and extent of contamination within these soil piles. It is probable a significant portion of the soil piles may have been deposited after the 1987 CIS survey.

3. Figure 3-2, pg. 5: The figure is illegible and should be revised to be useful to the reader.

4. Section 3.1.1., pg. 6, 2nd paragraph: This section fails to include a justification for the proposed sampling locations and depths, which do not lie within the ground scar area (i.e., SD-01, SS-04, SS-06, SS-03). DOE should provide justification for these locations. Additionally, DOE should consider the use of field screening methods for the location of these samples.

5. Commenting Organization: Ohio EPA Commentor: M. Proffitt
Section #: 3.1.2 Pg #: 6 Line #: ¶ 3 Code:
Original Comment #:
Comment: If these borings would yield information beneficial to the Till/Vadose zone investigation, then they should be continued past the water table. This data should then be incorporated in the Till/Vadose zone report.

6. Table 3-2, pg. 9: The units for PCBs should be reviewed. The concentration at location 1183 is highly elevated. Additionally, other tables in the document report PCBs in ug/kg.

7. Section 3.1.2, pg. 11: DOE fails to provide a justification for only Hydropunch sampling for VOCs. DOE should consider sampling for additional constituents while conducting the sampling. This will allow for the most efficient collection of samples and answer questions concerning groundwater contamination that may be raised by soil data.

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8. Commenting Organization: Ohio EPA Commentor: M. Proffitt
Section #: 3.1.2 Pg #: 11 Line #: ¶ 1 Code:
Original Comment #:
Comment: Section 3.1.2, page 6, ¶ 2 indicates that ground water in this vicinity is contaminated with inorganic and organic constituents. As a result, the hydropunch samples should be analyzed for these contaminants, not just VOC's.

9. Commenting Organization: Ohio EPA Commentor: M. Proffitt
Section #: 3.1.2 Pg #: 11 Line #: ¶ 3 Code:
Original Comment #:
Comment: In ¶ 2 of this section, it is stated that there is no existing inorganic or organic data for this area. Ohio EPA, therefore, recommends sampling the ground water for the full HSL list, not just VOC's.

10. Commenting Organization: Ohio EPA Commentor: M. Proffitt
Section #: General Pg #: Line #: Code:
Original Comment #:
Comment: How will the stratigraphy for the hydropunched zones be characterized? If sole characterization stops at the water table, then the ground water samples (via hydropunch) will be obtained from unknown strata.

11. Commenting Organization: Ohio EPA Commentor: M. Proffitt
Section #: 3.1.3 Pg #: 13 Line #: ¶ 3 Code:
Original Comment #:
Comment: This paragraph states that perched ground water has been significantly contaminated with Uranium in this area. If additional characterization of ground water contamination is necessary, Ohio EPA recommends coupling hydropunch sampling with the boring program.

12. Section 3.1.3, pg. 13, 3rd paragraph: The OU5 Work Plan Addendum for the production area additional sampling proposed the installation of monitoring wells and sampling near the garage. Has this data been encompassed into this sampling plan. DOE should consider the use of hydropunch sampling in this area. Previous data reported in the OU5 WPA suggest significant groundwater contamination other than uranium in this area.

13. Commenting Organization: Ohio EPA Commentor: M. Proffitt

Section #: 3.1.4 Pg #: 13 Line #: ¶ 2 Code:
Original Comment #:
Comment: What additional ground water investigation is planned if soil contamination is confirmed at depth?

14. Figure 3-9, pg. 19: Why has DOE not proposed collecting hydropunch samples at deep borings in this quadrant? DOE should consider the use of hydropunch sampling in this area. DOE's proposal to collect hydropunch in other areas is a good example of obtaining the most information possible from a given sampling event.

15. Section 3.1.5, pg. 20, 4th paragraph: If additional borings are need to obtain sufficient sample volume, the soil should be homogenized prior to collecting specific analyte volumes. The exception to this is VOCs of course.

16. Section 7.1.2, pg. 36: 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.

17. Appendix B, pg. B-2: Revise table to show cyanide as 1/8 for number above background. If this is not a correct revision, then cyanide should be removed from the table.

18. Appendix B, pg. B-4: DOE should provide the reasoning behind the use of the 50% exceedance criteria described in footnote (2).