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**OHIO EPA COMMENTS ON THE PSP FOR TRAP
RANGE INVESTIGATION**

07/29/93

OEPA/DOE-FN

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COMMENTS

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State of Ohio Environmental Protection Agency

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JUL 30 10 24 AM '93

George V. Voinovich
Governor

July 29, 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 Trap Range Investigation.

If you have any questions please contact Kurt Kollar or me.

Sincerely,

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

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PARTIAL
ACTION RESPONSE
to 5-2016
(6472)

OHIO EPA COMMENTS
ON
PSP FOR TRAP RANGE INVESTIGATION

- 1) Commenting Organization: Ohio EPA Commentor:
Section #: 2.2 Pg #: 3 Line #: Code: c
Original Comment #:
Comment: There are several concerns with the estimated volume of lead expended. A normal trap shoot consists of four station with 25 shots at each station resulting in 100 shotgun shells expended. The reference to No.7 shot is wrong. Lead shot is not manufactured as No. 7 but as 7½ size. The weight of the shot is listed in different amounts. A typical trap load weight is 1½ oz (1.125) of lead shot. DOE's estimated volume of lead expended is on the conservative side. There is no allowance for practice rounds and various other occurrences. The output of lead should be approximately 85,000 pounds. This figure is probably the lower range limit.
- 2) Commenting Organization: Ohio EPA Commentor:
Section #: 2.3 Pg #: 5 Line #: 8 Code: c
Original Comment #:
Comment: Will further analysis be conducted (such as TCLP) if high concentrations of contaminants are found in the HSL sample results?
- 3) Commenting Organization: Ohio EPA Commentor:
Section #: 2.6 Pg #: 7 Line #: last paragraph Code: c
Original Comment #:
Comment: Why were construction vehicles allowed to drive through this area? If the equipment has caused material from the trap range to be carried to other areas the extent of spreading by the tires will have to be determined. This is especially true in the area 100 feet south of the trap house where heavy concentrations of trap wastes are expected.
- Commenting Organization: Ohio EPA Commentor:
Section #: 2.7 Pg #: 8 Line #: 3rd paragraph Code: c
Original Comment #:
Comment: The statement is correct. There may have been radiological surface contamination in the area of the shooting platform but it may be impossible to tell since construction vehicles were allowed to drive through the area and successfully dilute what may have been there. This will need to be verified.
- 5) Commenting Organization: Ohio EPA Commentor:
Section #: 3.1 Pg #: 9 Line #: 2nd paragraph Code: c
Original Comment #:
Comment: The metal detector's ability to define the entire area of concern for lead-shot is questionable. The fringe areas where the shot will be sparse but still a problem and may not be identified by the metal detector survey.

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- 6) Commenting Organization: Ohio EPA Commentor:
Section #: 3.1 Pg #: 11 Line #: 2nd paragraph Code: c
Original Comment #:
Comment: How low is low?
- 7) Commenting Organization: Ohio EPA Commentor:
Section #: 3.3.1 Pg #: 14 Line #: Code: c
Original Comment #:
Comment: Will the 3 soil samples collected from areas where lead-shot was not found be from within the trap range boundaries and what will be the way of not finding any lead-shot?
- 8) Commenting Organization: Ohio EPA Commentor:
Section #: 3.3.1 Pg #: 14 Line #: last Code: c
Original Comment #:
Comment: The samples used for HSL SVOC will be the samples with the highest percentage of trap fragments in them. The problem is the samples may not be representative of the area with the highest percentage of trap fragments in them. It was stated earlier that it would be expected that the trap fragments would fall closer to the trap house than the lead-shot. The SVOC samples however are being collected where the lead-shot concentration is the highest and the trap fragments the lowest.
- 9) Commenting Organization: Ohio EPA Commentor:
Section #: 3.3.1 Pg #: 15 Line #: 3rd paragraph Code:
Original Comment #:
Comment: Since DOE has not stopped the area around the shed and trap from being torn up by construction activities will valid hot spots be found?