U-006-305.33

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CONDITIONAL APPROVAL OF REVISED OPERABLE UNIT 4 REMEDIAL INVESTIGATION REPORT

09/22/93

OEPA/DOE-FN
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COMMENTS

OhioEPA
State of Ohio Environmental Protection Agency
Southwest District Office
40 South Main Street
Dayton, Ohio 45402-2086
(513) 285-6357
FAX (513) 285-6404

G-6069

4766

SEP 27 10 06 AM '93

George V. Voinovich
Governor

September 22, 1993

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

Dear Mr. Craig:

The purpose of this letter is to conditionally approve the revised O.U. 4 RI Report. The conditions for approval are that DOE address, to Ohio EPA satisfaction, the comments listed below:

Response to Ohio EPA Comments

1. Original Comment #41 - Ohio EPA believes that updated groundwater table contours should be included in the O.U. 4 RI that reflect the change in gradient. It is true that other documents will pick up this issue but the final RI should represent the current environmental conditions in O.U.4.

General Comment

1. Ohio EPA maintains that DOE can not disregard the failed TCLP result from the silo berm material. DOE will need to incorporate contingencies within the Feasibility Study/Proposed Plan to address the fact that portions of the berm soils may be hazardous by toxicity.

Specific Comments

1. Table 5-4, pg. 5-28: The table does not include concentrations for Silo 3 materials. In the initial draft RI Table 5-4 included Silo 3 material exposure point concentrations.
2. Section 6.5.3, pg. 6-6: Unlike Sections 6.5.1, 6.5.2, 6.5.4, 6.5.5, Section 6.5.3 does not include any summary risk numbers. The text should be revised to include summary risks.
3. Section 6.6.3, pg. 6-11: DOE's response to previous OEPA comment #38 stated that uncertainty associated with berm soils data assumptions would be addressed in this section. The uncertainty section fails to address DOE's decision to disregard the failed TCLP data.

(ALLEN(R)
PARTIAL ACTION
RESPONSE TO
S-2219
(0620)

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

Sincerely,

Graham E Mitchell

Graham E. Mitchell
Project Manager

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

INTER-OFFICE COMMUNICATION

TO: Graham Mitchell, FEMP Project Coordinator

FROM: Tom Schneider, DERR, SWDO

DATE: September 13, 1993

SUBJECT: COMMENTS - REVISED OU4 REMEDIAL INVESTIGATION REPORT (8/93)

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Detailed below are DERR/SWDO comments on the above referenced document. DDAGW should review the document and associated responses to comments to ensure incorporation of Geotrans' and their comments.

cc: Jenifer Kwasniewski, DERR/CO

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