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**OHIO EPA COMMENTS ON THE REVISED FIRE
TRAINING RAWP/CHID AND DOE'S RESPONSE
TO COMMENTS**

11/16/93

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

November 16, 1993

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

Dear Mr. Craig:

Listed Below are Ohio EPA comments on the Revised Fire Training RAWP/CHID and DOE's response to comments.

Response to Comments

1. General comment 9. DOE fails to address the original comment. The response breaks down the time into categories, however, the time lengths are not justified, ie. 6 months needed for the report.
2. General comment 5. DOE needs to properly reference the table in section 3.
3. Comment 8. DOE should implement a reuse or recycle program for the metal that will be generated by this project. For cost effectiveness the metal can be segregated, stored and possibly incorporated with another project (like plant 7).
4. Section 3.2.2.4. Regarding the scarification of concrete surfaces to achieve decontamination, what is meant by a clean debris surface? What is DOE's basis for insuring that by removing 0.6 cm of surface concrete that the remaining concrete will be clean?
5. Comment 12. DOE does not address the disposition of PCB contaminated soil or the collection of the verification samples (pg. 3-18) from the probable area? Please clarify.
6. Comment 19. DOE intends on sampling both soil and water media for Dioxin analysis. Given the fact that Dioxins are not readily mobile in water DOE should consider having the soil samples analyzed first. If dioxins are detected in the soil then have the water samples analyzed. Given the cost of dioxin analysis this may save some money.

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7. Specific Comment 5. DOE indicates the use of glovebags to contain hot metal filings generated during the grinding process to remove hot spots on the pressure vessel. Ohio EPA doesn't believe this will work unless the glovebag is modified. The poly on the glovebag will melt almost immediately when exposed to the hot metal filings. There is potential for a fire and a breach in containment.

Revised RAWP
General Comment

1. The CPI&D/RAWP appears to contain sound concepts for the closure of this HWMU; however, the layout of the document makes it difficult to obtain a complete picture of the closure methodology. DOE-FEMP needs to add additional text to "tie the document together". Although references to other sections are sometimes included, more references must be added along with a brief description of what additional information will be found in other sections. As an example: Section 3.2.2.4 includes information on the removal of structures. References are made throughout this section to decontamination of structures, however, not until Attachment 5 (ARARS) is this described in detail, and no reference is made to that Attachment within Section 3.2.2.4

Specific Comments

1. Section 2.1.2, Page 2-6, Drum Storage Area - The plan fails to include information on the length of time materials were stored in the "temporary" drum storage area (ie. greater than 90 days?). Also, please indicate within the plan if there was ever any evidence of spills or releases in the drum storage area.
2. Section 2.2.2, Page 2-16, Paragraph 2 - The document states that several organics were detected, but not included in the list of contaminants. Provide additional justification for eliminating these constituents from further consideration (ie. Is this based on PQLs?).
3. Section 3.1, Page 3-1, Paragraph 2 - The plan states that a revised CPID will be submitted if F-listed constituents are discovered in environmental samples. Please indicate why failure of TCLP analysis would not affect the closure plan in the same way.
4. Section 3.2.2.3, Page 3-13, Paragraph 2 - The surface waters collected from the FTF are to be processed through the Plant 8 water treatment system. Modify the CPID to include details

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- on the limitations of this system. Include which constituents and what concentrations can not be treated through the Plant 8 water treatment system.
5. Section 3.2.2.3, Page 3-13, Paragraph 3 - The plan does not supply sufficient information on the management of the absorbent materials. Will these be containerized while awaiting characterization results?
 6. Section 3.2.2.4, Pages 3-14 and 3-15, Block Building - The plan states that the ignitable wastes were burned within the block building and provides for decontamination of the concrete floors within the building; however, DOE-FEMP must provide justification for ignoring the potential for the asphalt surrounding the block building to have come in contact with these hazardous wastes.
 7. Section 3.2.2.4, Pages 3-15 and 3-16, Skid Tank, Sump and Open Top Tank - The CPID does not appear to address the potential for contamination of the skid tank, sump and the open top tank with hazardous wastes. Please clarify when and how these units will be decontaminated.
 8. Section 3.2.2.4, Page 3-21, Paragraph 1 - The plan states that the magnesium burn area may contain soil that meets the definition of hazardous waste. Please clarify which analyses will be performed on this soil (ie. is DOE-FEMP only concerned with TCLP metals?).
 9. Section 3.2.2.5, Page 3-21, Post-Excavation Soil Characterization Sampling - DOE-FEMP must provide justification for the sampling intervals chosen to demonstrate that the mixed wastes have all been excavated. Also, the plan indicates that the samples will only be collected from the bottom of the excavation; however, this will not be sufficient to demonstrate that the horizontal extent of contamination has been defined.
 10. Section 3.3.3.1, Page 3-44, Paragraph 1 - This section of the CPID indicates that wipe samples will be collected from structures and equipment. If these are to be analyzed for hazardous constituents, DOE-FEMP must be aware that the Ohio EPA does not accept wipe samples for verification of decontamination unless it is impossible or inadvisable to immerse the entire surface with water and collect a rinseate sample.

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11. Section 4.1.2, Page 4-2, Decontamination Verification of the FTF Components - The plan does not specify which components of the FTF will be decontaminated using the methods described in this section.
12. Section 4.1.2, Page 4-3, Table 4-1 - Since Nitrates are a contaminant of concern, but not a hazardous constituent, the decontamination action level for this constituent should be the MCL (10 mg/l).
13. Section 4.4, Page 4-6, Statement of Certification - The certification statement included in the CPID is incorrect. The owner/operator certification statement must include the exact wording found in OAC 3745-50-42(D).
14. Section 5.0, Pages 5-1 and 5-2, Schedule for Closure - The Ohio EPA recognizes that DOE-FEMP may require additional time over 180 days to complete closure of the FTF; however, the plan does not provide the necessary justification for this extension. The justification should include reasons such as: safety issues and magnitude of operation necessary to complete closure of this unit.

If you have questions about these comments please contact Kurt Kollar, Robin Fisher or me.

Sincerely,



Graham E. Mitchell
Project Manager

GEM/rlf

cc: Jenifer Kwasniewski, DERR
Tom Schneider, DERR
Robin Fisher, DHWM
Kurt Kollar, DERR
Jim Saric, U.S. EPA
Jean Michaels, PRC
Robert Owens, OOH