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PILOT PLANT R.A. FINAL REPORT

01/05/94

OEPA/DOE-FN

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COMMENTS

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State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

January 5, 1994

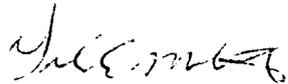
Re: PILOT PLANT R.A.
FINAL REPORT

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

Dear Mr. Craig:

Attached are Ohio EPA's comments on the Pilot Plant Removal Action (#24) Final Report. If you have any questions please contact Tom Schneider or me.

Sincerely,


Graham E. Mitchell
Project Manager

GEM/acp

Enclosure

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

OHIO EPA COMMENTS
ON
PILOT PLANT SUMP REMOVAL ACTION NO.24 FINAL REPORT

1. Section ES.2, pg. ES-4, 2nd paragraph: The sections should discuss the fact that just because TCLP limits were not exceeded the soils/sludges can still be hazardous wastes. Any detection of the listed wastes determines the material to be a hazardous waste regardless of TCLP concentrations.
2. Section ES.4, pg. ES-6: Based upon the data included in this report, the extent of VOC contamination, and the amount of liquid previously collected via the sump, Ohio EPA believes DOE should undertake additional actions in the vicinity of the Pilot Plant. The findings of this removal action have expanded the size of the HWMU and the extent of mixed waste contamination. DOE should consider an in situ remediation for the source area that appears to underlie the Pilot Plant. Such remediation could include pump and treat and/or soil vapor extraction technologies. Containment of the contamination associated with this HWMU is essential to controlling the generation of additional mixed wastes.
3. Section 1.0, pg. 1-2, 1st paragraph: It would seem the objective of determining "if the sump was still physically connected to the abandoned and covered drain system under the Pilot Plant" was met. The sump was still connected and thus the HWMU boundaries are expanded to include the under drain system. The Final Report should be revised to include a discussion of the expansion of the HWMU based upon the physical connection.
4. Section 3.1.1.2, pg. 3-28, last paragraph: The document should clarify whether the depths discussed are total depth or depth below the bottom of the sump excavation.
5. Section 3.10, pg. 3-17: The backfill used in the sump excavation was obtained from the Nitric Acid Tank Car Removal Action/Closure. The backfill was a solid waste generated during a closure and should not have been used. Ohio EPA has significant concerns with regard to Removal Action #17 and expects the document to be revised.