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**COMMENT DISPOSITION RECORD ON OHIO EPA
COMMENTS DATED NOVEMBER 16, 1993 ON
THE FINAL FIRE TRAINING FACILITY
RAWP/CPID**

02/10/94

DOE-FN/EPA

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RESPONSES

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DOCUMENT: Fire Training Facility RAWP/CPID, Final - September 1993

REVIEWER: Ohio EPA, Comments dated November 16, 1993

NO.	COMMENT	RESPONSE
Comments on Responses		
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, i.e., 6 months needed for the report.	Table 5-1 will be revised to indicate an activity duration of 2 months for preparation of the Final Report. The text of Section 5 will be revised to provide additional justification for the extended performance schedule. These revisions will address the phasing of field activities associated with 1) building demolition, 2) tank removal, and 3) soil excavation.
2	General comment 5. DOE needs to properly reference the table in section 3.	The text in Section 2.2 will be revised to provide a direct reference to Tables 3-7 and 3-8 in Section 3.3.3.1.
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).	The DOE concurs with this recommendation and will remain alert for opportunities to integrate with reuse/recycling programs where possible that may be underway during the FTF action. DOE considers recycling to be the preferred method of disposition.
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?	The text of Section 3.2.2.4 will be revised to clarify application of the performance-based physical extraction methods discussed in the Closure Plan Review Guidance for RCRA Facilities - Interim Final (September 1993), and to incorporate the definition of a clean debris surface. Revisions will include language from the debris rule describing acceptable methods for verifying that 0.6 cm has been removed.
		Section 4.1 will be revised to incorporate the performance-based decontamination criteria.

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5	<p>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.</p>	<p>The text on page 3-18 will be revised to indicate that soils removed from the area of PCB contamination will be managed or dispositioned in accordance with Removal Action No. 17 guidelines. There is currently no capacity for mixed PCB solid waste disposition. A reference to Sections 3.3, Sampling and Analysis, and 3.4, Waste Disposal and Management will be added to the text for verification purposes.</p>
6	<p>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.</p>	<p>The text of Section 3.3.3.1 and footnotes to Table 3-3 will be revised to incorporate a tiered approach to Dioxin analyses as outlined in your comment. Due to the constraints imposed by holding times, the surface water sampling will require that dioxin analysis be conducted prior to the receipt of results for soil.</p>
7	<p>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.</p>	<p>The text on page 3-16 will be revised to specify manual grinding that will not generate hot metal.</p>

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General Comments		
1	<p>The CPID/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.</p>	<p>Additional text will be incorporated into Section 3.0 that clearly describes the layout of the section, and highlights the cross-references between sections and subsections.</p>

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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 (i.e., 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.	The text on page 2-6 will be revised to expand upon the description of the area where drums of flammable liquids were stored prior to use during fire training exercises. No written records are available for the time period the containers may have been stored here. However, the soil gas survey described in Attachment 7 indicated that this area is free from organic contamination.
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 (i.e., Is this based on PQLs?).	The text on page 2-16 will be revised to indicate that the referenced contaminants were included in the list of COCs; they had not been deleted.
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.	The text on page 3-1 will be revised to reference the cleanup levels presented in Section 4.1 and will be changed to include soils for which the Toxicity Characteristics are exceeded.
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 on the limitations of this system. Include which constituents and what concentrations cannot be treated through the Plant 8 water treatment system.	The text on pages 3-3 and 3-13 (Section 3.1.2) will be revised to indicate that all waters removed will be containerized and placed into RCRA mixed waste storage. References to the Plant 8 VOC system will be removed from the text.
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?	The text on page 3-13 will be expanded to indicate that absorbent materials will be placed into a drum and managed as mixed wastes pending characterization. Only inorganic absorbents will be used.

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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.	The asphalt pad surrounding the block building is considered to be free from hazardous contamination and there is no knowledge of storage or leaks/spills on the asphalt. Section 3.2.2.4 will be revised to explain why sampling of the asphalt is unnecessary. The surface radiological survey cleared the asphalt area of elevated concentrations of radionuclides. Volatile organic compounds, if indeed released to the asphalt surface, have had more than sufficient time and exposure to volatilize and disperse. Analysis for semivolatile organic compounds would serve only to confirm some components of tar that bind the asphaltic concrete. Finally, no known sources for metals exist for the asphalt pad.
7	Section 3.2.2.3, 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.	Text has been added on page 3-15 to address the issue of hazardous waste contamination of the skid tank. The text on page 3-16 will be revised to clarify status of the sump and open top tank. The piping leading to the sump, and the open top tank will be managed as mixed wastes based on their contact with hazardous wastes and radioactive materials. The text will be further clarified to indicate the sump is simply an excavated low point in the soil and does not include a structural component.
		The text revisions will indicate that decontamination of the sump piping is not anticipated. The open top tank will be cut, containerized, and managed as a mixed waste.
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 (i.e., is DOE-FEMP only concerned with TCLP metals?).	The text on page 3-22 will be revised to reference the FTF containments of concern. The magnesium burn area will be assessed in the same fashion as other excavation verification samples.

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9	<p>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.</p>	<p>The text on page 3-21 will be revised to indicate that post-excavation verification soil samples will be collected on a 29 foot grid spacing. This is the maximum grid interval spacing identified in Table 5 of the Closure Plan Review Guidance for RCRA Facilities - Interim Final (September 1993). The text will also be revised to indicate that the sampling locations will extend to the boundaries of the excavated area, thereby eliminating the need for "sidewall" samples from the shallow (1 foot depth) excavation.</p> <p>Section 3.3.2 will be revised to reflect the increased number of samples.</p>
10	<p>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.</p>	<p>The text on page 3-44 will be revised to clarify that wipe samples are in support of health and safety monitoring, and will not be used to demonstrate attainment of closure criteria.</p>
11	<p>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.</p>	<p>The text on page 4-2 will be revised to specifically identify those items that will be decontaminated using the performance-based physical extraction methods discussed in the Closure Plan Review Guidance for RCRA Facilities - Interim Final (September 1993). None of the FTF structures will be decontaminated using water rinses.</p>
12	<p>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).</p>	<p>Table 4-1 has been deleted as decontamination will be conducted in accordance with the hazardous debris standards (40 CFR 268.45).</p>

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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).	The text on page 4-6 will be revised to incorporate correct certification statement from 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.	Table 5-1 will be revised to indicate an activity duration of 2 months for preparation of the Final Report. Further, the text of Section 5 will be revised to provide additional justification for the extended performance schedule. These revisions will address the phasing of field activities associated with 1) building demolition, 2) tank removal, and 3) soil excavation.