R-015-208.6

5382

REMOVAL ACTION 14 CONTAMINATED SOILS ADJACENT TO THE SEWAGE TREATMENT PLANT INCINERATOR

04/06/94

DOE-1364-94
DOE-FN/EPA
5
RESPONSES
OU3

Department of Energy 5382
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6357

APR 06 1994
DOE-1364-94

Mr. James A. Saric, Remedial Project Director
U. S. Environmental Protection Agency
Region V-5HRE-8J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Mr. Thomas Schneider, Project Manager
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402-2086

Dear Mr. Saric and Mr. Schneider:

REMOVAL ACTION 14 CONTAMINATED SOILS ADJACENT TO THE SEWAGE TREATMENT PLANT INCINERATOR

This letter is to transmit response to comments received from Ohio Environmental Protection Agency (OEPA) on the Final Work Plan Addendum for Removal Action 14 - Contaminated Soils Adjacent to the Sewage Treatment Plant Incinerator. The comments were part of the conditional approval of the Final Work Plan Addendum for the Removal Action. The comment responses are included as Enclosure 1.

If there are any questions, please contact Art Murphy at (513) 648-3132.

Sincerely,

Johnny Reising

for Jack R. Craig
Fernald Remediation Action
Project Manager

FN:Murphy

Enclosures: As Stated

Recycled and Recyclable

-5382

cc w/enc:

K. A. Chaney, EM-424, TREV
D. R. Kozlowski, EM-424, TREV
G. Jablonowski, USEPA-V, AT-18J
J. Kwasniewski, OEPA-Columbus
P. Harris, OEPA-Dayton
M. Proffitt, OEPA-Dayton
J. R. Craig, DOE-FN
R. C. Farr, DOE-FN
J. Michaels, PRC
L. August, GeoTrans
F. Bell, ATSDR
AR Coordinator, FERMCO

ENCLOSURE 1

RESPONSES TO OHIO EPA COMMENTS ON THE REMOVAL ACTION 14 FINAL WORK PLAN ADDENDUM

Comment #1 - In Ohio EPA's approval of DOE's Response to Comments submittal, Ohio EPA suggested biased sampling be conducted at the base of the power line tower east of the STP. DOE has failed to address this concern within the work plan addendum. Ohio EPA reiterates the need to sample soils at the base of this tower. DOE must revise the work plan addendum to include sampling at the base of the tower.

Response #1 - The intrusive sampling plan for the off-property soils has been modified to include two sample points under the power line tower. One point will be analyzed for Total Metals and the other point will be analyzed for Uranium 234, 235, and 238, Radium 226 and 228, and Thorium 228, 230, and 232. The results will be reported along with the other intrusive samples taken from the off-property soils.

Comment #2 - Table 2, page 11: What basis did DOE use for analyzing soil for only one dioxin? DOE should provide a justification for only analyzing 2, 3, 7, 8-Tetrachlorodibenzo-p-dioxin.

Response #2 - The original Work Plan for RA-14 included analyzing for only one type of dioxin. The single dioxin in question, 2,3,7,8-Tetrachlorodibenzo-p-dioxin was selected as an indicator for all dioxins in the initial sampling plan. Due to the stoichiometry of the synthesis reaction pathways that yield the congeners of dioxin, 2,3,7,8-Tetrachlorodibenzo-p-dioxin is the best indicator for the presence of all dioxin compounds. The distribution of chlorine atoms in this configuration results in a more energetically favorable and stable structure. If 2,3,7,8-Tetrachlorodibenzo-p-dioxin is not detected in a media sample, the likelihood of finding other dioxin compounds is extremely remote. All sampling results to date have detected no dioxins. Since the best dioxin indicator (2,3,7,8-Tetrachlorodibenzo-p-dioxin) was not detected, no additional dioxin samples will be required.

Comment #3 - Section 4.1, page 14, 2nd paragraph: At what point will DOE determine the extent of contamination buried under the backfill? Backfilling this area without any verification samples being collected results in the need for additional characterization at a later date.

Response #3 - Verification samples were taken in the area that was backfilled for the CRU5 monitoring wells. The sample results were included in the addendum on page 60, Table 4, samples 52 through 58. All of the sample results were below the 100 pCi/g action level for on-property soils. Also, immediately before the area was backfilled, a walkover survey of the area was performed with results below the action level.