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R-041-207 .1

CONDITIONAL APPROVAL REMOVAL ACTION 31 WORK PLAN

02/24/95

OEPA DOE-FN
2
APPROVAL



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
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I-164
MAR 1 10 28 AM '95

George V. Voinovich
Governor

February 24, 1995

RE: DOE FEMP
MSL# 531-0297
HAMILTON COUNTY
CONDITIONAL APPROVAL
REMOVAL ACTION 31 WORK PLAN

Mr. Jack Craig
Director
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, Ohio 45329-8705

Dear Mr. Craig:

This letter provides conditional approval of DOE's Removal Action 31 Work Plan submitted to Ohio EPA on January 20, 1995. The conditions of approval are satisfactory resolution of the attached comments. If you have any questions, please contact me at 513-285-6073.

Sincerely,

Thomas M. Ontko
Remedial Action Coordinator
Office of Federal Facilities Oversight

tmo

cc w/att: Ruth H. Vandegrift, ODH
Mike Proffitt, DDAGW
Tom Schneider, OFFO
Jim Saric, U.S. EPA
Terry Hagen, FERMC0
Jean Michaels, PRC
Manager, TPSSU, DERR/CO
Lisa August, GeoTrans

SHANON
PARTIAL
ACTION RESPONSE
TO Q-0440
(8627)

Ohio EPA Comments on Removal Action 31 Work Plan

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: Line #: Code: M
 Original Comment #:
 Comment: The Ohio EPA is concerned that the soil disposition proposal is inconsistent with Removal Action 17. Additionally, we are unsure the proposal is consistent with the final action. These concerns indicate additional discussion of soil disposition is warranted prior to Ohio EPA approval of the proposal. We propose a conference call in the near future to discuss the most appropriate path forward for this action as well as the revision of RA#17 if necessary.
 Response:
 Action:
- 2) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: ES Pg #: ES-1 Line #: 37 Code: c
 Original Comment #:
 Comment: The text here in the Executive Summary and in Section 5 are somewhat unclear as to the design of the sump. Is it intended to collect sediments? If it is designed to hold a large volume of sediments, can provisions be made to prevent these accumulated sediments from acting as a source of groundwater pollution? If it is not designed to hold a large volume of sediments, what provisions are being made to prevent it from filling during the first large storm?
 Response:
 Action:
- 3) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 8 Pg #: 8-2 Line #: 26 Code: c
 Original Comment #:
 Comment: For completeness the proper citation for this ARAR is 40CFR Part192.02(b)(2).
 Response:
 Action:
- 4) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: G Pg #: G-3 Line #: Table G-3 Code: c
 Original Comment #:
 Comment: There are incomplete rows in this table.
 Response:
 Action:
- 5) Commenting Organization: Ohio EPA Commentor: ODH
 Section #: Attachment E Pg #: 2 of 29 Line #: Code: c
 Original Comment #:
 Comment: The Project-Specific Description refers to replacing excavated soils back in the South Field. If this is not in error, please clarify.
 Response:
 Action: