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COMMENTS ON THE WASTE PIT STORM WATER RUN-OFF EE/CA

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submitted by
Vicky Dastillung

1) The EE/CA does not contain enough information. Here are some questions that might have been answered:

-How soon will the advanced waste water treatment facility be ready to operate? What contaminants will it remove? How much of the contaminants will it remove? What volume of water will it be able to process? What is the volume of each water source that will feed into the AWWT facility? What will be the treatment cost of the water from the waste pits when it goes to the AWWT facility instead of just the biodenitrification facility? For comparing the alternatives this operating cost should be added to the Alternative 4 costs if the AWWT facility will be used eventaully to process the storm water from the pit area.

-Final remediation alternatives are mentioned. However, since they are essential in selecting the EE/CA alternative, they need to be elaborated on to the extent that is possible to date. What are the alternatives being considered and what objectives do they satisfy? What estimate can be made on how long it will take to implement each of the alternatives?

-Alternative 4 is said to take a "shorter" time to implement than Alternative 2. How much shorter? How many years will the chosen alternative serve before the final remediation choice is begun?

-Why are there no facts from the 1989 Monitoring Report included in the EE/CA?

2) Uranium is designated as the contaminant of concern in the EE/CA. However, <u>all</u> potentially dangerous contaminants, especially thorium and other metals, should be as low as possible. Can additional treatments be done to the run-off water to capture contaminants other than U? How effective might they be?

3) Alternative 4 should not be labeled Collection and <u>Treatment</u>. A 10% reduction in U and then simply discharging it to the Great Miami River is unacceptable to the public. Discharges of U to the Great Miami already exceed the guidelines regularly. This would add even more. If this alternative is chosen for the time before a final remediation is completed, what <u>total</u> improvement is afforded the environment(not just Paddys Run Creek)? Moving contaminants from here to there at such a cost is a waste of money, if the contaminants are still migrating and mobile at a similar volume. This makes Alternative 1 look reasonable compared to 4 since the discharge to Paddys Run would eventually go to the River anyway or into the aquifer where the South Plume pumping would eventually get it.

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4) Under Alternative 2 is listed the solidifying of the sludge of Pits 5 & 6. How is this done? Will it need to be done eventually for the final remediation chosen? If so the $1,042,200 will eventually be spent sooner or later. The costs should also be looked at as long term total costs to the Operable Unit.

5) Could a combination of 2 & 4 be done capping the pits that are the main source of the contaminants plus the constructing of a collection system? Or are all of the uncovered pits contributing equally to the contamination of the storm water?

6) During construction how do you keep contaminated dust from leaving the site?

7) Alternative 5 was eliminated quickly from consideration, but it involved disposal at NTS in special $600 containers. What would be the cost of putting the waste pit contents in regular barrels that would be housed on-site in large underground (tornado-proofand weather-proof) parking garage type buildings. There the barrels could be on a controlled pad situation, with easy visual inspection. If leakage began to occur years later, the barrels could be overpacked again. Until the source of the contamination is dealt with, there will be continuing problems.

As I said in my South Plume EE/CA comments, please remember that all of these comments were made by a non-expert. While the answers to some of the questions may seem trivial to the experts, it is still important to be as clear and thorough as possible if community acceptance of alternatives is to be maximized.

Submitted by
Vicky Dastillung
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