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COMMENTS - OU5 AREA 1 PHASE 1 RAWP RESPONSE TO COMMENTS

11/01/96

OEPA DOE-FM
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COMMENTS



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

November 1, 1996

RE: DOE FEMP
MSL 531-0297
HAMILTON COUNTY
COMMENTS - OU5 AREA 1 PHASE 1
RAWP RESPONSE TO COMMENTS

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed DOE's October 10, 1996 submittal, "Submittal of the Area 1, Phase 1 Remedial Action Work Plan Response to Comments Document." Attached are comments detailing Ohio EPA concerns with DOE's responses. Ohio EPA recommends DOE's next submittal include the revised RAWP and response to comments.

In addition to providing the attached comments, I would like to take this opportunity to reiterate our September 4, 1996 request that "DOE provide the RTRAK precertification data to us in electronic format at it's earliest availability." It is Ohio EPA's understanding that substantial RTRAK data has been gathered and is being used by DOE for decision making.

If you have any questions, please contact me.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FERMC0
Ruth Vandergrift, ODH

Manager, TPSS/DERR,CO
Dave Ward, GeoTrans
Sharon McLellan, PRC

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(Janke (G))
partial
action response
to doe-0037-97
(10058)

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 October 25, 1996
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implement an ALARA approach to soil excavation for soils exceeding 50 ppm total uranium as defined on page 9-5 in the OU5 ROD. Specifically, DOE must define why it is not economically practical to excavate soils determined by the RTRAK or HPGe to exceed 50 ppm or even the 80 ppm FRL. The commitment in the ROD clearly suggests the removal, when economically practical, of soils exceeding 50 ppm based upon field instruments. Ohio EPA believes it is necessary for DOE to make a determination of how they are complying with the ALARA commitment.

Specific Comments

- 5) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: E-4 Line #: A1 Code: C
 Original Comment #: USEPA #1
 Comment: Ohio EPA does not concur with DOE's suggestion that excavation will not be necessary for the OSDF Sediment basin. Ohio EPA review of data in the area suggests excavation will be necessary for compliance with the Th-232 FRL. The revised RAWP must include data from the areas of the Pump station and the Sediment basin to support the "no excavation needed" activity description.
- 6) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: E-5 Line #: A1 Code: C
 Original Comment #: USEPA #1
 Comment: In order to support DOE's position that no action will be necessary to isolate this area, contaminant data from Area 1 should be included in the figures of the document. Sample data may be available from the STP removal action or other sampling activities in that area.
- 7) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: E-7 Line #: Code: C
 Original Comment #: USEPA 1
 Comment: DOE must ensure that the date of 1/30/98 for submittal of the Certification package for Areas A2, A3, C, and D1 will allow for sufficient time for review and approval prior to any need to initiate construction in any of these areas.
- 8) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: Page 2 Line #: Code: C
 Original Comment #: 2
 Comment: Revise action to state text within the RAWP will be revised to reflect sampling for WAC attainment.

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- 9) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Page 3 Line #: Code: C
Original Comment #: 3
Comment: The response states that the OSDF is scheduled to accept waste the fall of 1997. It was Ohio EPA's understanding the first waste placement schedule had been extended to spring 1998 and was agreed upon by DOE, USEPA and Ohio EPA. Please clarify if the response represent a change in this agreement.
- 10) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Page 4 Line #: Code: C
Original Comment #: 5
Comment: Data from Area A1 should be included in the RAWP figures to support the position this area does not present a recontamination threat. As stated previously, data from the STP removal action should be available.
- 11) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Page 5 Line #: Code: C
Original Comment #: 7
Comment: The response should be revised to reflect the removal of Area D from the scope of the Area 1 Phase 1 RAWP.
- 12) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Page 9 Line #: Code: C
Original Comment #: 16
Comment: The response should be revised to reflect the agreement reached between Ohio EPA, DOE and USEPA during our 10/29/96 conference call. The RAWP should reference the proposed fugitive dust control document.
- 13) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Page 7 Line #: Code: C
Original Comment #: 11
Comment: The response and the RAWP should be revised to discuss how precertification will be conducted in forested areas. The methodology for such precertification must be included in the revised RAWP.
- 14) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Page 8 Line #: Code: C
Original Comment #: 14
Comment: Ohio EPA does not concur with the proposed language modification. Ohio EPA

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believes all field tiles on the eastern portion of the facility should be removed to protect the OSDF. Additional clarification regarding the neighboring property owners desires should be provided. Is the desire to maintain flow or to prevent increased flow? If sufficient justification can be provided for not removing the northeast swale tiles, the revised language should read "all drain tiles known or discovered during Area 1 Phase 1 activities, with the exception of the northeast drainage swale, will be removed."

- 15) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: Page 13 Line #: Code: C
 Original Comment #: 20
 Comment: a) What measures are used to ensure a maximum speed of 15 mph is maintained?
 b) All future remedial action work plans must include a dust suppression plan for review and approval.
- 16) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: Page 17 Line #: Code: C
 Original Comment #: 30
 Comment: a) Due to the lack of verification data available to Ohio EPA for the RTRAK or HPGe, Ohio EPA believes it is appropriate to use a 2XFRL hot spot criteria. Upon completion of the verification study, the hot spot criteria could be re-evaluated. In addition to the per 12m² criteria, Ohio EPA believes it is necessary to determine an area based hot spot formula criteria. DOE Order 5400.5 is cited as a TBC in the OU5 ROD. The hot spot criteria outlined in this order suggests that a hot spot not exceed $(100/A)^{1/2} \times \text{FRL}$ where A is the hot spot area in square meters.
 b) What contaminants will the HPGe be evaluating for hot spot criteria? How does DOE intend to assess hot spots for non-radiological contaminants? Additional details must be added to the RAWP to address these issues.
- 17) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Original Comment # 38
 Section #: 6 Pg. #: 6-11 Line #: 11 Code: C
 Comment: In order that the worth and accuracy of all R-TRAK and HPGe readings can be verified during independent review, ambient environmental data should be rigorously referenced to the data obtained from these devices (to the extent possible). The procedures and frequency for this referencing should be specified in the RAWP. The practice of not referencing R-TRAK and HPGe readings to ambient environmental data can only be justified by demonstrating good comparability between these detectors and laboratory data for the range of environmental conditions anticipated during deployment.

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- 18) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Page 25 Line #: Code: C
Original Comment #: 44
Comment: a) Ohio EPA agrees with the basis for selecting ASCOCs but the process for actual location\orientation of a CU is still unclear. It would seem more appropriate to locate them along drainages, surface features or known release areas. These issues may not be as important for Area 1 Phase 1 but should be considered in all future remediation plans.
- b) Ohio EPA still finds the proposed CU administration during certification to be confusing and potentially unmanageable. Ohio EPA suggests DOE consider re-evaluation of this methodology if necessary following submittal of the first certification package.
- 19) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Original Comment #: 47
Section #: 7 Pg. #: 7-7 Line #: 32 Code: C
Comment: The text should be revised to discuss how the number of additional samples will be determined to certify cleanup of a CU that had failed at a previous certification attempt.
- 20) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Page 32 Line #: Code: C
Original Comment #: 54
Comment: Ohio EPA believes procedures outlined in the dust suppression plan must be included as a portion of the RAWP for review and approval.