F-OU5
FFTA

QUESTIONS AND COMMENTS
PUBLIC MEETING

EG&G

Date: 4-14-94

Comment on Fire-training Pit remedial action plan

Comments on Health Based Cleanup Levels or other levels (PRGs)

1. Its good to move forward and start cleaning-up.
2. The cleanup goals need to include Polycyclic aromatic Hydrocarbons (PAHs). Depending on the cut of diesel fuel, PAHs may ~~be~~ represent several % of the fuel. PAHs have MCLs for drinking water and the US EPA just released several (over)

Optional:

Name: Jeff Fisher

Address:

Phone: [redacted]

ML-9466

EG&G MOUND-25-13-10-01-01-9504120009

a guidance document on PAH cancer potencies. Some PAHs are known animal carcinogens.

3. My priority list (from a toxicologist's perspective)

A. Get Rid of free product

B. make sure benzene level is below the MCL for drinking water

C. bioremediate THP & PAHs or other?

d. BTEX - ~~should~~ I could not tell if this is a problem or not from the report. ??

F-045
FFTA

EG&G MOUND APPLIED TECHNOLOGIES
P.O. BOX 3000 MIAMISBURG, OHIO 45343-3000 • TEL (513) 865-4020

JUN 28 1994

Mr. Arthur W. Kleinrath
Environmental Engineer
U. S. Department of Energy
Miamisburg Area Office
P.O. Box 66
Miamisburg, OH 45343

Dear Mr. Kleinrath:

Public Comments on the FFTA IRA Action Memorandum

The National Contingency Plan (NCP), Section 300.825(2)(c), states that the DOE is required to "consider", for inclusion in the Administrative Record, significant comments that were received after the close of the public comment period.

I am requesting approval to place the attached public comment responses into the administrative record.

If you have any questions concerning this subject, please contact Alan Spesard of my staff at (513) 865-3859.

Very truly yours,

Monte A. Williams
Manager, ER/CERCLA

ORIGINAL SIGNED BY

Approved: _____
Charles S. Friedman
Vice President
ER, WM & D&D

/sdf
Attachment

cc: w/attach.
A. Spesard
J. Zahora

RESPONSE TO PUBLIC COMMENT
FFTA REMEDIAL ACTION PLAN

Comment: 1. *Its good to move forward and start cleaning-up.*

Response: Comment acknowledged. It is our objective to perform needed remedial activities sooner rather than later.

Comment: 2. *The cleanup goals need to include polycyclic aromatic hydrocarbons (PAHs). Depending on the cut of diesel fuel, PAHs may represent several % of the fuel. Several PAHs have MCLs for drinking water and the USEPA just released a guidance document on PAH cancer potentials. Some PAHs are known animal carcinogens.*

Response: As stated in the OU9 RI/FS and QAPP, PAH compounds are included in the remediation cleanup goals of the FFTA. Regulatory control of cleanup standards for UST falls to the Ohio Bureau of Underground Storage Tank Regulations (BUSTR). Since BUSTR has not established remedial cleanup goals for PAHs, cleanup standards must be established from a risk analysis.

Mound has set detection limits for PAH in the QAPP for this work. These detection limits are set based on the toxicity, mobility and persistence in the environment and ARARs. These limits vary, but do not exceed 720 ppb. The level of PAH in the FFTA, as of March 1993, were below the detection limits. Since any risk based cleanup level would be constrained by these detection limits, the level of PAH in the FFTA will be below any cleanup standards based on toxicity, mobility, persistence and ARARs.

Also, the FFTA contaminated soil does not extend to the depth of the ground water. Since ground water and thus drinking water are not impacted, drinking water MCL standards can not be used as remedial cleanup standards.

Comment: 3. *My priority list (from a toxicologist's perspective)*
- *A. Get rid of free product.*
- *B. Make sure benzene level is below the MCL for drinking water.*
- *C. Bioremediate or other? TPH & PAHs*
- *D. BTEX - I could not tell if this is a problem or not from the report.*

Response: 3. A. The results of soil sampling and analysis conducted in March 1994, show that there is no free petroleum hydrocarbon product. The study also indicated that the petroleum hydrocarbon contamination ceased at a height above the occurrence of any ground water. If free product is encountered during the remedial cleanup, it will be immediately remediated.

B. The contamination ceases at a height above the occurrence of any ground water. Since ground water in the FFTA is not impacted, MCLs for drinking water are not applicable. In addition, water sampling and analysis did not detect benzene in the FFTA.

C. As indicated in the Remedial Action Plan, bioremediation, using petroleum-biodegrading microbes, will be employed to reduce the levels of petroleum hydrocarbons to below applicable or relevant and appropriate standards (ARARs). These microbes will digest petroleum hydrocarbons and reduce the total petroleum hydrocarbons (TPH) and polycyclic aromatic hydrocarbons (PAHs).

D. Results from the original investigation of the Fire Fighting Training Area showed some levels of Benzene, Toluene, Ethylbenzene, and Xylene (BTEX) above the levels set by the Bureau of Underground Storage Tank Regulation Agency (BUSTR). The sampling performed in March 1994 also showed elevated BTEX levels. The selected remediation will treat both TPH and BTEX to levels set by BUSTR.

F-045
FFTA

Department of Energy
Field Office, Albuquerque
Dayton Area Office
P.O. Box 66
Miamisburg, Ohio 45343-0066

JUL 18 1994

Jeff Fisher
Hydro-Log
P.O. Box 555
Yellow Springs, OH 45387

Dear Mr. Fisher:

Thank you for your comments on the Fire Fighting Training Area Removal Action. We appreciate the time you took to review the document. Our responses to your comments are enclosed. In addition, your comments and our responses will be put in the administrative record as a record of the decision making process with a copy in the CERCLA reading room.

Sincerely,

Arthur W. Kleinrath
ER Program Manager

Enclosure

cc w/enclosure:
Monte Williams, EG&G Mound
Alan Spesard, EG&G Mound
Diane Spencer, USEPA
Brian Nickel, OEPA

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