

State of Ohio Environmental Protection Agency

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June 22, 2004

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

RE: COMMENTS ON PSP FOR WASTE PITS 4 THROUGH 6 AND THE BURN PIT

Dear Mr. Taylor:

This letter provides Ohio Environmental Protection Agency comments on the Project Specific Plan for Investigating the Material from Waste Pits 4 through 6 and the Burn Pit.

Should you have any questions, please contact Tom Ontko or me.

Sincerely,



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

- cc: Jim Saric, U.S. EPA
- Terry Hagen, Fluor Fernald
- Mark Shupe, GeoTrans, Inc.
- Michelle Cullerton, Tetra Tech EM Inc.
- Ruth Vandergrift, ODH

Ohio Environmental Protection Agency Comments on the PSP for Investigating Subsurface Material from Waste Pits 4 through 6, and the Burn Pit

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 1.1 Pg #: 1-1 Line #: 15 Code: general
 Comment: Subsurface sampling of Waste Pit 3 has been completed. This plan addresses Waste Pits 4, 5 and 6 and the Burn Pit. When will PSPs for Pits 1, 2 and the Clearwell be submitted?

- 2) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 1.2 Pg #: 1-2 Line #: 1st line on page Code: c
 Comment: The text states that Waste Pit 4 was in use until 2004. Is this a typo?

- 3) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 1.2 Pg #: 1-3 Line #: 15 Code: c
 Comment: The text states that Pits 5 and 6 have synthetic liners. The text does not describe if the synthetic liners are intact or if they were damaged or destroyed by the excavating equipment. Nor does the Plan describe any measures to restore the synthetic liner after sampling.

- 4) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.1 Pg #: 2-1 Line #: middle of the 2nd para Code: c
 Comment: The text states, "Therefore, only the radiological constituents, total uranium, radium-226, radium-228, thorium-228, thorium-230, thorium-232, cesium-137, and technetium-99, will be kept as COCs for this PSP to define the depths of excavation as they will be the driver of the excavation." We find this scaled-down list of COCs surprising considering the discussions we had over the COC list for the Waste Pit 3 sampling plan. As you recall, the Ohio EPA objected to the long COC list because of concerned with the multiple pushes necessary to obtain enough sample volume. At that time, the FCP argued that the expanded COC list was required to confidently plan the excavation. A careful look at previous reveals that COCs other than uranium drive the excavation in Pit 3. Data from Pit 3, boring number 8, reveals the tetrachloroethylene will drive the excavation at that location. For other borings, Aroclors and arsenic were detected above their FRLs in the lowest interval which had uranium above the FRL. This lends support to the FCPs earlier contention that we do not have a high degree of confidence that rad contamination will drive the excavation.
 The selection process for COCs should be revisited paying particular attention to the results of the Waste Pit 3 sampling. It would be acceptable to Ohio EPA to implement the approach used in Pit 3, i.e. analyze for rads for the entire boring and analyze for other constituents as needed to determine the excavation limit.

- 5) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.2 Pg #: 2-2 Line #: 9 Code: c
 Comment: The text reads in part, " Eight of the borings located on the Waste pit floors will be advanced to the to the unsaturated sands and gravels of the GMA...".

Ohio EPA Comments
PSP for Pits 4 thru 6 sampling
Page 2

This is not acceptable. All borings should terminate in the till before the GMA materials are encountered. If a boring should inadvertently breach the tills, the depth of adjacent borings should be adjusted such that they terminate at least one foot above the elevation where the GMA was found.

Footnotes in Appendix D which indicate the borings which penetrate to the GMA should also be revised.

- 6) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.2 Pg #: 2-2 Line #: 10 Code: c
Comment: The sentence partially quoted above continues "...and two six-inch intervals spaced one-foot apart will be collected to determine if contamination has penetrated this area". It is unclear if the two six-inch intervals are separated horizontally (two borings) or vertically (both samples taken from the same boring).
- 7) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.2 Pg #: 2-2 Line #: 25 Code: c
Comment: The text states that borings on the Pit sidewalls will range in depth from 0 to 6.0 feet. This is acceptable as long as borings do not go deeper than 3.5 feet below the pit's bottom.
- 8) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.3 Pg #: 2-3 Line #: 16 Code: c
Comment: The text addresses contingencies if waste pit material is encountered within a 12-inch radius of a sampling point. The commitment to remove waste pit materials within a 12-inch radius is weak. Waste pit material should be removed to a 10-foot radius from the boring location. The Project should have a bull dozer available to accomplish the removal. After sampling and sealing of the borehole, the original topography should be re-established so that water can not pond around the boring location.