

**348**

**REMOVAL #1 - PLANT 6  
U.S. DOE FERNALD  
OH6 890 008 976**

**05/08/90**

**USEPA/DOE-FMPC  
2  
LETTER  
OU5**

Hopper / Act 348

3 commitments

cc ELIKAN, BROWN, ENGLAND

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EPT

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Lisa



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

SCHWARTZMAN

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:  
SHR-12

MAY 08 1990

Mr. Bobby Davis  
United States Department Of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

COPY: GALPER  
WEINREICH  
RHODUS  
5/14/90

See Davis  
RSS

Re: Removal #1 - Plant 6  
Feed Materials Production Center  
Fernald, Ohio  
OH6 890 008 976

Dear Mr. Davis:

During the April 24, 1990, Technical Information Exchange meeting (TIE), the United States Department of Energy (U.S. DOE) and Westinghouse Materials Company of Ohio informed the United States Environmental Protection Agency (U.S. EPA) that the pumping of contaminated groundwater from under the Plant 6 building was halted on April 23, 1990. The reason presented for this work stoppage was the detection of volatile organic compounds (VOCs) in the water that was being pumped.

When the removal action was approved and initiated last year, U.S. EPA directed the site to complete hazardous substance list (HSL) analysis of the water that was being collected. The results presented at the TIE meeting were for the first samples collected and analyzed for hazardous substances other than radionuclides. Water collected since implementation of this removal was placed into a wastewater treatment system that is not designed for treatment of VOCs. The facility's National Pollution Discharge Elimination System (NPDES) permit does not permit the discharge of VOCs.

Another requirement of this and all other removal actions at the site is that sample collection and analysis and reporting are subject to the Quality Assurance Project Plan (QAPP) approved as part of the Remedial Investigation (RI) work plan. This requires that all samples be analyzed at one of the laboratories formerly identified under the work plan. Changes to the QAPP must be proposed and approved by U.S. EPA.

The following items require action on the part of the site:

1. In an April 2, 1990, letter, U.S. EPA notified U.S. DOE that a work plan for expansion of removal #1 to Plants 2/3 and 9 should be submitted. This work plan was due thirty (30) days from the receipt of the April 2, 1990, letter. A work plan has not yet been submitted. The proposal must be

done?

ASZ

submitted within fifteen (15) days of the date of this letter. Water samples from collection wells will require a full HSL analysis prior to full-scale pumping.

Commitment  
Action

002/102

2. As discussed with U.S. DOE during a May 3, 1990, meeting in Chicago, the current QAPP needs to be reviewed and updated. This review should be completed and a revised document submitted for approval to U.S. EPA within sixty (60) days of the date of this letter.

Commitment

OK

3. All samples collected and analyzed as part of the response actions at the site need to be collected and analyzed in accordance with the approved QAPP.

Action  
Commitment

RS/Smith

4. A modified work plan for removal action #1 - Plant 6 needs to be submitted to U.S. EPA within thirty (30) days of the date of this letter. The work plan should include a proposal and schedule for VOC treatment of the contaminated groundwater from under the building.

5. All work plan modifications and addendums need to include a strategy for coordination between removal and remedial response actions. This strategy should include validation and data transfer procedures. There needs to be some assurance that individuals responsible for removal actions are coordinating with operable unit managers and environmental management personnel. Operable unit managers and remedial response quality assurance personnel need to be reviewing removal activities and data collection for consistency of the action with final remedial actions, technical adequacy, and for quality of work performed.

Action

6. U.S. EPA's On-Scene Coordinator should be notified immediately upon stoppage of work.

Please contact me at (312/FTS) 886-4436 if you have any questions.

Sincerely yours,

*Catherine A. McCord*

Catherine A. McCord  
On-Scene Coordinator

cc: Bruce Boswell, Westinghouse  
Maury Walsh, OEPA  
Graham Mitchell, OEPA-SWDO