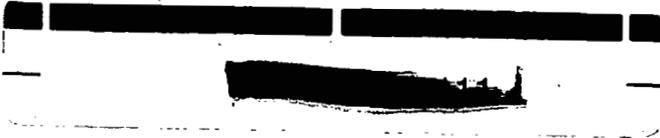


925

**DATA REPORTING AND INTEGRATION
FEED MATERIALS PRODUCTION CENTER
FERNALD, OHIO
OH6 890 008 976**

06/12/90

**USEPA/DOE-FMPC
4
LETTER**



JUN 19 1990 ACTION: HOPPER
EPA Project File
AP 7-18

COPY: MOHR
PATTERSON
SAVAGE
SCHWARTZMAN
RHODUS
6/19/90



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

925

REPLY TO THE ATTENTION OF

5HR-12

JUN 12 1990

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

Re: Data Reporting and Integration
Feed Materials Production Center
Fernald, Ohio
OH6 890 008 976

Dear Mr. Davis:

It has become evident that several problems regarding the response actions at the Feed Materials Production Center have developed or are continuing with regard to the transfer of data, coordination of removal and remedial actions, and notification of unusual events. These problems are illustrated by the following situations:

1. On February 12, 1990, the United States Environmental Protection Agency (U.S. EPA) sent a letter to United States Department of Energy (U.S. DOE) regarding U.S. EPA's difficulty in locating information in the Feed Materials Production Center (FMPC) database. In response to the letter, a meeting was held on February 20, 1990. During the meeting, it was agreed that the entire database be resubmitted to U.S. EPA by February 26, 1990, and the data would be presented on computer disks in the format established in the meeting. The agreed format was variable length comma delineated. The submission was received by U.S. EPA's contractor, PRC Environmental Management, Inc.; however, the format for the water level measurements was not in the format agreed to by U.S. EPA and U.S. DOE's contractor. On February 28, 1990, a verbal request was made to U.S. DOE's contractor to resubmit the information. Again this information was not in the agreed format. On June 1, 1990, this information was again requested but has not yet been submitted. The data should be submitted within ten (10) days of the date of this letter.
2. U.S. DOE has committed to citizen's groups and to U.S. EPA at the February 20, 1990, meeting, to provide verbal notice of the discovery of any new locations of contamination off the FMPC property. This commitment was not fulfilled during the recent discovery of contamination in a private well. The resident and the

property owner, the general public, and U.S. EPA should have been informed of the increasing contaminant levels in the well. Formal protocols for forwarding well data to property owners should be developed and followed. It is important that notice procedures include notice requirements for any increased or elevated levels of contamination to property owners, U.S. EPA, and the Ohio Environmental Protection Agency (OEPA) by telephone as soon as it is discovered. U.S. DOE should not wait for the data to be fully verified. Concern over public health in this instance outweighs the need for complete accuracy. A written protocol for notification should be submitted within fifteen (15) days of the date of this letter.

3. U.S. DOE has expressed to U.S. EPA that the delays in communicating new contamination is due to time delays in the laboratory analyses process. While there is some inherent "reasonable" time interval in the laboratory analysis and quality assurance process, the reporting times with respect to the response actions to the site are excessive. This has been a chronic problem associated with the site since the beginning of the response action. Some procedures need to be established to expedite sample analysis turnaround times and communication of analysis results to U.S. EPA and the public. First, U.S. DOE should examine the times allowed in the laboratory analyses contracts. U.S. DOE should verify these times and strictly enforce them. Second, U.S. DOE needs to inform the laboratories that any significant or elevated levels should be communicated to U.S. DOE immediately, even if the result is not verified or fully quality assured. Procedures for improvement of the communication of contamination information should be presented in the June or July monthly report to U.S. EPA.
4. Also during the February 12, 1990, data meeting, U.S. DOE committed to provide monthly and quarterly data updates to U.S. EPA and OEPA. U.S. DOE committed to including a monthly data report with the monthly reports required pursuant to the 1990 Consent Agreement. U.S. DOE has not attached the data reports to the March, April, or May monthly reports. No data from rounds 6, 7 and 8 of groundwater monitoring has been forwarded to U.S. EPA. The next monthly report, due June 20, should include this information. The quarterly report is due to U.S. EPA by June 30, 1990.
5. Unusual events and a summary of findings are required to be included in the monthly written reports submitted to U.S. EPA. This report currently should include information obtained during pre-removal action evaluations, removal actions, remedial investigation (RI) activities, and summary of feasibility study (FS) activities. Monthly reports have not been complete and have not always been timely. The Consent Agreement requires that a monthly report be submitted by the twentieth of each month for the previous month's activities. However, unusual events, like the discovery of contaminants in a new location or private well, should be immediately communicated to U.S. EPA, as well as being included in the monthly reports.

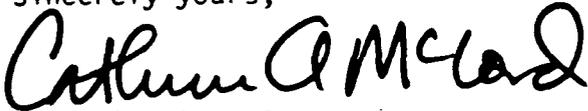
6. U.S. DOE has committed to integrate environmental information collected under removal actions and construction activities with information obtained during RI activities. Westinghouse personnel involved with sampling of private wells, removal actions, and U.S. DOE's environmental monitoring report (EMR) are not adequately communicating their results to remedial response personnel or U.S. EPA. Evidence that these data bases have been integrated and activities coordinated and that the Quality Assurance Project Plan (QAPP) approved under the RI work plan is being followed, needs to be presented to U.S. EPA. This information should be submitted in the June or July monthly status report to U.S. EPA and OEPA.
7. During a May 3, 1990, meeting in Chicago, U.S. DOE committed to provide to U.S. EPA by May 18, 1990, a status report regarding the integration of a long-term groundwater monitoring program (that is being taken over by Westinghouse) into remedial QAPP procedures. CERCLA is the driving regulatory authority for the long-term monitoring and the RCRA groundwater and EMR data collection must follow the procedures outlined in the QAPP. U.S. DOE must make provisions for integration of these programs. U.S. DOE has not forwarded this information to U.S. EPA. A proposal should be submitted within thirty (30) days of the date of this letter.
8. As presented in U.S. EPA's March 12, 1990, letter, prior to construction projects that include the disturbance of soil, an evaluation of surrounding environmental conditions needs to be completed. On April 17, 1990, a facsimile of a U.S. DOE letter to Westinghouse regarding this matter was forwarded to U.S. EPA. It is not clear whether these procedures have been initiated. It is also not clear whether there will be another submittal to U.S. EPA or whether the document that was facsimile is the proposal that was submitted for U.S. EPA review. As stated in U.S. EPA's March 12, 1990, letter, U.S. EPA should be consulted prior to the initiation of any project that requires the disturbance of soils at the site.
9. During the April 24, 1990, Technical Information Exchange (TIE) meeting, U.S. EPA repeated a previous request for four copies of the Miami University ecological study. A hard-copy of all RI ecological data that has been collected was also requested. Please submit the report and the requested data within ten (10) days of the date of this letter.

The problems outlined above indicate that U.S. DOE, Westinghouse, and the response contractors need to formalize a strategy for data integration and communication. Because of requirements associated with being a Superfund site, requirements of the 1990 Consent Agreement, and the demands of the overall cleanup project, effective communication and coordination is critical to the overall success of the project. Unless otherwise specified, documentation that the problems stated above are being addressed should be submitted to U.S. EPA within thirty (30) days of the date of this letter.

U.S. EPA and OEPA are willing to meet with site representatives in Chicago within the thirty day period to discuss options for solving these chronic problems.

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

Sincerely yours,



Catherine A. McCord
Remedial Project Manager

cc: Bruce Boswell, Westinghouse
Maury Walsh, OEPA
Graham Mitchell, OEPA-SWDO
Edward Schuessler, PRC Environmental Management, Inc.