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**LEAD RELEASE AT THE FMPC**

**08/04/89**

**WMCO:R:89-215**  
**WMCO/DOE-FMPC**  
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**LETTER**

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WMCO:R:89-215

August 4, 1989

Mr. James A. Reafsnyder  
Site Manager  
U. S. Department of Energy  
P. O. Box 398705  
Cincinnati, Ohio 45239-8705

Dear Mr. Reafsnyder:

**LEAD RELEASE AT THE FMPC**

Reference: DOE-1246-89, Letter to President, WMCO from J. A. Reafsnyder, "Lead Release at the FMPC," dated July 6, 1989.

The reference letter requested WMCO to conduct a preliminary assessment for removal actions due to the release of lead-contaminated material at the FMPC, as described in 40 CFR 300.64. The assessment report was to be submitted to your office no later than August 1, 1989.

The referenced regulation requires a preliminary assessment of a release that is identified for possible CERCLA response pursuant to 40 CFR 300.65, "Removals." This assessment is to be performed by the "lead agency," which is to base the assessment on readily available information.

By Presidential Order 12146, DOE has been designated as the lead agency for events taking place at DOE facilities. Therefore, the preliminary assessment described in Section 300.64 would be prepared by DOE for its own use in determining whether a removal action as described in Section 300.65 is required.

James A. Reafsnyder

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As you are aware, steps have been under taken as of June 22, to correct the lead-grit blast material problem through gathering up and drumming of residual lead-grit blast material at the FMPC Site. Accordingly, the intent of 40 CFR Section 300 has been met, and specifically the requirements of 300.65 also are being met by the ongoing cleanup activity. Nevertheless, the information requested for a preliminary assessment in 40 CFR 300.64 has been assembled and is provided in the attachment to this letter.

Very truly yours,



W. A. Weinreich, Vice President  
FMPC Restoration

Attachment

MJG/SLB/lf

c: S.L. Bradley  
W.H. Britton  
M.J. Galper  
K.C. Gessendorf  
J.T. Grumski  
S.A. Kottner  
P.J. Levine  
P.E. Mohr  
T.A. Poff  
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Central Files  
EC Files

Commitment No. DW:89:0196

ATTACHMENT TO  
WMCO:R:89-215

## LEAD RELEASE AT THE FMPC

The Code of Federal Regulations, 40 CFR 300.64, indicates that a preliminary assessment of a release or threat of a release identified for possible CERCLA response pursuant to 40 CFR 300.65 shall, as appropriate, be undertaken by the lead agency as promptly as possible. The assessment is to be based on readily available information, including (although not limited to):

- (1) Identification of the source and nature of the release;
- (2) Evaluation of the threat to public health;
- (3) Evaluation of the magnitude of the potential threat; and
- (4) Evaluation of factors necessary to make the determination of whether a removal is necessary.

Presidential Order 12146 delegated "lead agency" authority to the Department of Energy for DOE facilities. Based on the evaluations and cleanup actions already undertaken, it does not appear necessary for DOE to perform the preliminary assessment defined in 40 CFR 300.64. The following discussion provides the information that would be needed by DOE if a decision were made to prepare a preliminary assessment document.

During the week of June 5, 1989, WMCO personnel noted the presence of grit material at the Plant 2/3 Pad. Based on prior grit blast activities to remove old lead-based paint from structures preparatory to repainting, samples of the grit material were collected and subjected for analysis of lead content. The initial areas from which samples were taken included the Plant 2/3 Pad area, and the nearby collection trench and sump.

Analysis of the grit blast residue showed concentrations of leachable lead exceeding 5 ppm. The AEDO was immediately notified and subsequent notifications were made to the Oak Ridge Operations Center and thence to the regulatory agencies.

A review was initiated to determine the circumstances leading to the presence of the grit blast residue, and the extent of the associated lead contamination. A program of cleanup to remove this lead contamination was initiated. A description of this program, and a review of the circumstances by which this lead contamination was produced, is contained in WMCO:R(WO-S)89-100, "Grit Blast Material Clean Up Plan," dated July 6, 1989. A copy of this WMCO document is included as an appendix to this report. Information sufficient to establish the source and nature of the release is contained in that report.

The presence of lead contamination mixed with grit blast residue in the collection trench and sump raised the possibility that stormwater flow from the trench to Paddy's Run Creek could have allowed lead contamination to leave the FMPC site boundaries. Immediate action was taken to remove the contamination from the trench, and samples were collected from four locations

where stormwater flow from the site could have reached Paddy's Run.

EP toxicity test results for those samples were all less than 1.0 mg/l, which is to be compared with the RCRA limit of 5 mg/l. Analysis of uranium and thorium concentrations in those samples also gave results below the site limits for uncontrolled areas, as listed in WMCO Site Procedure FMPC-720.

Thus, no off-site contamination exceeding allowable values have been detected at the most likely locations where rainwater carry-off could occur, and the ongoing cleanup activities should preclude any future off-site release of the lead contamination.

The sampling and subsequent analysis demonstrate that no threat to public health has resulted from the on-site release of lead-contaminated paint residues.

The effort to remove grit blast residues from all site locations satisfies the intent of 40 CFR 300.65, "Removals," and will avoid any potential future threat to the environment or public health associated with the lead contamination. No further determination as to the need for a removal is needed, since such removal actions have already been implemented.