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**OU#5 - GROUNDWATER
U.S. DOE - FERNALD
OH6 890 008 976**

01/17/91

**USEPA/DOE-FMPC
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LETTER
OU5**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

307-1001-23

Cy O'Neil
Peterman
1060
CC: ERA File
AK File

JAN 17 1991

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

REPLY TO ATTENTION OF 5HR-12

RE: OU#5 - Groundwater
U.S. DOE - Fernald
OH6 890 008 976

Dear Mr. Avel:

Per our conversation of January 16, 1991, the United States Department of Energy (U.S. DOE) is not abiding by the commitments made to the United States Environmental Protection Agency (U.S. EPA) regarding the transmittal of Remedial Investigation (RI) data. U.S. DOE committed to monthly and quarterly electronic data transfer to U.S. EPA and the Ohio Environmental Protection Agency (OEPA).

Because of the long-term and recurring problems with the transfer of data, U.S. EPA met with U.S. DOE, Westinghouse, and remedial contractors to lay out procedures, format, and deadlines for the transfer of data. U.S. DOE and its contractors have not fulfilled the commitments made in this meeting. Only partial and deficient submittals have been made.

U.S. EPA has reviewed the limited data that has been submitted and has noted the following:

- (1) the lack of groundwater quality data
- (2) erroneous and missing groundwater elevation data
- (3) an incomplete description of sampling locations
- (4) samples that are held by the lab for extraordinarily lengthy periods of time (over 1000 days)

For example, the latest submittal of RI data included groundwater elevation measurements for May, June, and July 1990. Review of this data indicates that some groundwater elevations are incorrect. Some elevations given were several feet above or below previous elevations. There are no pumping or injection wells in these areas that would suggest such a change. Elevation measurements that illustrate this situation include:

- May 1990: wells 2068, 3018, 3054, 3068, 3094, 3107, and 3391
- June 1990: wells 2033, 3094, and 3127

- July 1990: wells 2043, 2068, 2094, 2120, 2387, 3043, 3094, and 3127 1060

Groundwater elevation data for several 1000-series wells was report for this period. These wells were generally in the waste pit and K-65 silo areas. These wells include:

- Wells 1004, 1010, 1011, 1021, 1029, 1031, 1032, 1034 (May), 1038, 1073, 1074, 1075, 1114, 1115.

Additionally, sample description files for several media are incomplete. Examples of this problem includes:

- No depth description is provided for subsurface soil samples collected at location 075.
- No north or east coordinates are provided for surface water samples.
- No "LOG-LOCATION" descriptions are provided for several surface water samples.
- No record of samples descriptions are provided for many surface water samples in the sample description file, eventhough analytical results are presented for these surface water samples.

The above deficiencies have been presented to illustrate specific problems with the data base. Additional deficiencies have been noted.

As communicated to U.S. DOE, the current problem with transfer of the data to U.S. EPA may be indicative of a serious problem with the data base as it has in the past. U.S. DOE must give a high priority to investigating and resolving this matter. U.S. DOE must respond to this letter within thirty (30) days of the date of this letter *

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

Sincerely,

Catherine A. McCord

Catherine A. McCord
Remedial Project Manger

cc: Acting Director, OEPA
Graham Mitchell, OEPA-SWDO
Leo Duffy, U.S. DOE
Joe LaGrone, U.S. DOE