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**REMOVAL #2 PIT STORM WATER
U.S. DOE FERNALD
OH6 890 008 976**

DOCUMENT DATE 01-10-91



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

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JAN 10 1991

REPLY TO ATTENTION OF:
5HR-12

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

Re: Removal #2 Pit Storm Water
U.S. DOE Fernald
OH6 890 008 976

Dear Mr. Avel:

On October 12, 1990, the United States Department of Energy (U.S. DOE) submitted a work plan for Removal #2, collection of storm water in the waste pit area. This area is included in Operable Unit (OU) #1. The United States Environmental Protection Agency (U.S. EPA) disapproved the draft work plan on November 13, 1990 and U.S. DOE submitted a revision on December 13 and 14, 1990. U.S. EPA has reviewed the revised work plan and is approving the work plan with the following modifications:

1. All sampling and analysis must be performed in accordance with the U.S. EPA-approved Quality Assurance Project Plan (QAPjP). Any required revisions to the QAPjP should be submitted to U.S. EPA for review and approval. The on-site laboratory may only be used for screening and not used for any samples that are required to be collected under the work plan for this removal.
2. U.S. DOE must submit to U.S. EPA a preliminary design report (at approximately 30% complete), and cost estimates at the preliminary and final design stages.
3. Within thirty (30) days of the date of this approval, U.S. DOE must submit a list of potential Applicable or Relevant and Appropriate (ARARs) and a strategy for compliance with them.
4. Attachment II, Section 2.0, Page 2, Paragraph 4: Within thirty (30) days of this approval, U.S. DOE shall submit a work plan supplement that includes a "build-over" criteria for all Hazardous Substance List (HSL) contaminants.
5. Attachment II, Section 2.0, Page 3, Paragraph 1: Within thirty (30) days of this approval, U.S. DOE shall submit a sampling plan supplement that provides the size of the grid

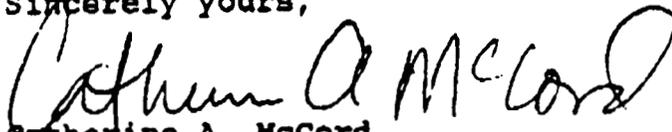
and the method to be used to collect "statistically representative" soil samples.

1133

6. Attachment II, Section 2.0, Page 3, Paragraph 1: Within thirty (30) days of this approval, U.S. DOE shall submit a work plan supplement that specifies sampling below the upper six inches of soil when any HSLs are detected and provide additional sampling if the build-over criteria is exceeded.
7. Attachment II, Section 2.0, Page 3, Paragraph 2: Field screening techniques must also be used in selecting samples for "full HSL" analysis.
8. Attachment II, Section 2.0, Page 3, Paragraph 3: Full hazard substance list (HSL) parameters shall be analyzed for in soil and water. The table is modified to coincide with this requirement.
9. Attachment II, Section 2.0, Page 3, Paragraph 4: Within thirty (30) days of this approval, U.S. DOE shall submit a sampling plan supplement that specifies the number of environmental monitoring verification samples and how these samples will be selected and collected.
10. Attachment II, Section 2.0, Page 4, Paragraph 1: Full hazard substance list (HSL) parameters shall be analyzed for in soil and water. The table is modified to coincide with this requirement.
11. Attachment II, Section 2.0, Page 4, Paragraph 4: Within thirty (30) days of this approval, U.S. DOE shall submit sampling plan supplement that specifies the method used to collect a "statistically representative" sample.
12. Attachment II, Section 2.0, Page 5, Paragraph 2: TCLP analysis shall be conducted by the method specified in 55 Federal Register 26986.

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

Sincerely yours,



Catherine A. McCord
Remedial Project Manager

cc: Richard Shank, OEPA - CO
Graham Mitchell, OEPA - SWDO
Joe LaGrone, U.S. DOE - ORO
Leo Duffy, U.S. DOE - HDQ

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