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

**DOCUMENT DATE 04-15-91**



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

1182

APR 15 1991

5HR-REPLY TO ATTENTION OF:

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

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

Dear Mr. Craig:

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 modified and approved the revised work plan on January 10, 1991. Twelve modifications were made to the approved work plan.

The first modification required:

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.

U.S. DOE was required to submit information supporting the modifications within thirty days. U.S. DOE submitted the documentation on March 5, 1991. In this submittal, U.S. DOE requested approval for use of laboratories not specified in the approved QAPjP.

In order for U.S. EPA to consider such a request, U.S. DOE must submit an amended a QAPjP and documentation that the additional laboratories are capable of accurately analyzing environmental samples. This is particularly true for the on-site laboratory, which was criticized by U.S. DOE's Tiger Team.

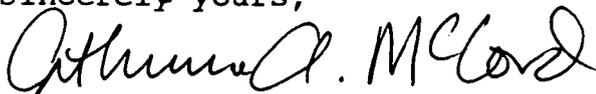
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U.S. DOE is proposing that the NET laboratory be used to analyze samples for the Hazardous Substance List (HSLs) analytes. U.S. DOE must provide documentation that the laboratory is capable of providing data of quality that is equivalent to that required in the RI QAPjP. This has been defined as data quality level IV, such as the level under the contract laboratory program (CLP). U.S. DOE has indicated that the NET laboratory was or is in the CLP program. U.S. EPA records indicate that this particular laboratory is not, or has not been, a part of the CLP program.

The laboratories can demonstrate their capability by providing the results of an independent audit. This audit should be equivalent in scope to those conducted for CLP laboratories. The results from U.S. EPA performance evaluation (PE) samples for the last four quarters should also be provided.

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

Sincerely yours,



Catherine A. McCord  
Remedial Project Manager

cc: Gerry Ionnaides, OEPA - CO  
Graham Mitchell, OEPA - SWDO  
Joe LaGrone, U.S. DOE - ORO  
Pat Whitfield, U.S. DOE - HDQ