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K-65 SAMPLING

7-26-90

OEPA/DOE

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LETTER



State of Ohio Environmental Protection Agency

Southwest District Office

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Dayton, Ohio 45402-2086
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Richard F. Celeste
Governor

July 26, 1990

RE: K-65 SAMPLING

Mr. Bobby Davis
DOE - FMPC
P.O. Box 398705
Cincinnati, Ohio 45239

Dear Mr. Davis:

The purpose of this letter is to conditionally approve the K-65 Silos Sampling and Analysis Plan and the K-65 Silo Embankment and Subsoils Sampling and Analysis Plan, providing the comments attached are addressed. These plans are consistent with requirements outlined in the State of Ohio/DOE-Westinghouse Consent Decrees (12-2-88). If you have any questions regarding these comments please contact me.

Sincerely,

Graham E. Mitchell
DOE Coordinator

GEM/bjb

cc: Maury Walsh, CO
Jack Van Kley, Attorney General's Office
Catherine McCord, USEPA

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**OEPA COMMENTS ON K-65 SILO SAMPLING
AND ANALYSIS PLAN**

1. Page 7, middle paragraph - It should be made clear that this scan will provide "Worst Case Condition" for radiological parameters only.
2. Page 12, 2.3 - The first paragraph states that an additional core will be collected from silo 1 to conduct laboratory stabilization studies. Considering the differences between silo 1 and 2's contents, samples should be collected from both silos for these studies.
3. Page 21, 3.2.3 - In the first paragraph, explain why the lime sludge is similar to K-65 residues.
4. Page 28, top paragraph - Paperwork in ziplock bags should not be in contact with the residues.
5. Page 29, Table 3-2 - Since the screening of alternatives reports discusses contaminant separation and possible recovery of metals (gold, platinum, palladium), shouldn't these parameters be analyzed. These silos should only be sampled once. Collect enough samples for all future analytical work and bench tests.
6. Appendix A, Page 11 - in 7.3.18 there is a caution stating that the sampling device should not be operating during removal. However, in 7.3.18.1 the operator is told to operate the device if difficulty is encountered. The purpose of this is understood but the wording is unclear.

**K-65 SILO EMBANKMENT AND SUBSOILS
SAMPLING AND ANALYSIS PLAN**

1. No comments - Previous concerns were addressed in January 10, 1990, submittal and conference call. That plan was approved verbally.

bjb