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CONDITIONAL APPROVAL K-65 SILO VERTICAL BORING SAMPLING PLAN

2-7-91

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LETTER

OhioEPA
State of Ohio Environmental Protection Agency
Southwest District Office
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[redacted]

1816

February 7, 1991

Re: **CONDITIONAL APPROVAL K-65 SILO VERTICAL BORING SAMPLING PLAN**

Mr. Jack Craig
U.S. DOE FMPC
P.O. Box 398705
Cincinnati, Ohio 45239

Dear Mr. Craig:

The purpose of this letter is to conditionally approve the K-65 Silo Vertical Boring Sampling Plan. The conditions for this approval are that DOE address to Ohio EPA's satisfaction the four comments listed below:

1) Page 2, Section 1.2.2, first paragraph: DOE must provide further justification for boring to a maximum depth of 20 feet, when the OU4 RI states that the silo walls are 26 feet high. In order to determine possible leakage from the silos the boring should be extended to at least penetrate to a depth equal to the bottom of the silos and preferably below that level.

2) Page 2, Section 1.2.2, last paragraph: It is confusing as to whether DOE intends to analyze the berm soils for Po-210. Bullet two of Section 1.3 suggests that it is possible to sample for Po-210, but analysis is only being conducted for Pb-210. DOE needs to justify why they will not analyze for Po-210, since this sampling is aimed at characterizing the nature and extent of contamination in the K-65 silo berm soils and Po-210 is a suspected contaminant.

3) Page 3, Section 1.3, first bullet: It is not readily apparent from reviewing the March 31, 1988 "RI/FS FMPC, Quality Assurance Project Plan" what the definition of full radiological analysis is. DOE should provide a page number for the definition in the QAPP or provide further detail as to the constituents included in "full radiological analysis."

   Ac-227 and Pa-231 are not included in the "RI/FS FMPC, Quality Assurance Project Plan" (3/31/88) and thus are probably not a part of the "full radiological analysis." These radioisotopes have been found in Silo 3 but were not

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analyzed for in the K-65 silos. It is most likely these isotopes are contaminants of the K-65 silos and thus should be included in the suite of radiological parameters to be sampled. If Ac-227 and Pa-231 are not already a part of the sampling planned, they should be added.

4) Page 4, Section 1.4, first paragraph: The reference to Table 3 in this paragraph should be corrected to refer to Table 2, "Geotechnical Properties".

If you have any questions about these comments please contact me.

Sincerely,

Graham E. Mitchell
DOE Coordinator

GEM/mlf

cc: Tom Winston, Ohio EPA
Kathy Davidson, Ohio EPA
Catherine McCord, U.S. EPA
Lisa August, Geotrans
Robert Owen, ODH
Ed Schuessler, PRC