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**COMMENTS - QUALITY ASSURANCE PROJECT
PLAN FOR REMEDIAL INVESTIGATION REV. 3,
FEED MATERIALS PRODUCTION CENTER**

08/05/91

OEPA/DOE-FMPC

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LETTER



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich
Governor

August 5, 1991

**COMMENTS - QUALITY ASSURANCE
PROJECT PLAN FOR REMEDIAL
INVESTIGATION REV.3, FEED
MATERIALS PRODUCTION CENTER**

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

Dear Mr. Craig:

G-600-301.3

Ohio EPA has reviewed the Quality Assurance Project Plan (QAPP) Rev. 3 and its associated Document Change Requests (DCRs). Ohio EPA has the following comments concerning the QAPP and DCRs:

General Comment

1. Ohio EPA only reviewed changes to the QAPP and has not reviewed the original QAPP. Comments are addressed in terms of FMPC DCRs and reference appropriate portions of the QAPP.

Specific Comments

1. DCR #8 (Section 6.1, pg. 8; Section 6.4, pg. 22; Section 6.5 pg. 24; Section 6.6, pg. 26): A rinsate sample should be collected for every 10 samples. Collecting one rinsate sample every 20 borings is unacceptable. Methods used in the past can not be corrected, but all future sampling must be conducted at the recommended rinsate sample frequency.
2. DCR #28 (Section 15.0): This procedure fails to document the procedure for USEPA and OEPA input into the revision or change of documents. The section should be amended to show where agency input and/or approval is required.
3. DCR #64 Data Validation, Page A-7: Figures referenced in this page are difficult to locate. Titles should be placed on figures so that the reader can determine which is Figure 5-1, etc..
4. DCR #64 Data Validation, Page A-11, Last Paragraph: DOE must provide more detail as to how the six FIDLER instruments were normalized to one another.

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5. DCR #64 Data Validation, Page A-83, (Duplicate Sample Analysis, Matrix Spike Analysis): DOE must be more specific as to how often these procedures are to be executed (not just "for every 10 to 20 samples").
6. DCR #64 Data Validation, Page A-84 to A-85, (Section B): This section has some significant problems.
 - a) Please provide the derivations of the equations. Equations should be used without numbers already inserted. Clarify where the constants used originated from.
 - b) On Page A-85, Lambda should be:
$$\text{Lambda (U-238)} = 4.89 \times 10^{-18} \text{ sec}^{-1}$$
and N(U-238) is not equal to 0.33 pCi/g. (The "pCu" typo on this line should be corrected.)
 - c) An initial review of the calculations suggests the specific activity of U-235 is 215 pCi/g not 2.15 pCi/g. DOE must clarify and correct this section so that a more thorough review of the calculations may be conducted.
7. DCR #64 Data Validation (Section C Number 1): Provide details as to the origin of this equation. Please, provide the derivation of the equation. See Comment #6.

These comments would have been provided to DOE earlier, but the initial submission of the QAPP to Ohio EPA failed to include the Data Validation Section. Please provide responses to these comments within 30 days.

If you have any further questions please contact me at (513) 285-6357.

Sincerely,



Graham E. Mitchell
FMPC Project Coordinator

TAS

cc: Kathy Davidson, Ohio EPA
Catherine McCord, U.S. EPA
Jim Saric, U.S. EPA
Lisa August, Geotrans
Ed Schussler, PRC