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**OPERABLE UNIT 4 - REMEDIAL INVESTIGATION
(RI) REPORT**

10/26/90

**DOE-40-91
DOE-FSO/USEPA
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LETTER**



Department of Energy
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OCT 26 1990

DOE-40-91

Ms. Catherine A. McCord, Remedial Project Director
U. S. Environmental Protection Agency
Region V - 5HR-12
230 South Dearborn Street
Chicago, IL 60604

Dear Ms. McCord:

OPERABLE UNIT 4 - REMEDIAL INVESTIGATION (RI) REPORT

- References:
- 1) Letter, C. A. McCord to B. J. Davis, "OU#4 RI Disapproval U.S. DOE Fernald OH6 890 008 976," dated September 27, 1990
 - 2) Letter, G. E. Mitchell to B. J. Davis, "RI/Risk Assessment O.U. 4," dated October 2, 1990

References 1 and 2 transmitted U.S. EPA and Ohio EPA comments on the first draft of the Remedial Investigation (RI) Report for Operable Unit 4. Deficiencies in data were noted in both of the referenced letters. These deficiencies, which were known by DOE, U.S. EPA and Ohio EPA prior to writing and reviewing the report, included inadequate representative internal residue sampling from the K-65 Silos and inadequate soil sampling underneath the K-65 Silos and from the berms around the K-65 Silos. Activities are currently underway to obtain these data deficiencies as both U.S. EPA and Ohio EPA are aware. Nevertheless, DOE prepared and submitted the Operable Unit 4 RI report in accordance with the 1990 Consent Agreement schedule. In accordance with CERCLA the RI report was completed based on data that were available at the time.

DOE recognizes that collection and analysis of the residue and soil samples is vital to completing of the CERCLA cleanup for Operable Unit 4. This data will not be available within the timeframes for revising the RI report as outlined in the 1990 Consent Agreement.

In accordance with Section XIII.G.6 of the Consent Agreement, U.S. DOE is extending the period for responding to U.S. EPA and

Ohio EPA comments on the Operable Unit 4, Remedial Investigation Report by 20 days and establishing a date for submittal of the revised document of November 19, 1990.

The reason for this extension is to better address the deficiencies and comments provided by the U.S. EPA and Ohio EPA on September 27, 1990 and October 2, 1990. This time extension will allow adequate time for the U.S. DOE to evaluate the options available to supply the outstanding RI data referenced in the U.S. EPA and Ohio EPA comments.

U.S. DOE does not intend to exercise extension options except for circumstances, such as this one, in which the additional effort will assist in producing a higher quality document.

If you have any questions, please contact me at FTS 774-6161.

Sincerely,



Andrew P. Avel
FMPC Remedial Action
Project Director

DP-84:Craig

cc:

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