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RI/FS WORK PLAN REVISION 1 U.S. DEPARTMENT OF ENERGY FEED MATERIALS PRODUCTION CENTER FERNALD, OHIO OH6 890 008 976

02/05/88

USEPA/DOE-EPD
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LETTER

[redacted]

ITEM 2E

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

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REPLY TO THE ATTENTION OF
5HS-12

FEB 05 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James A. Reafsnyder
United States Department of Energy
Environmental Protection Division
P.O. Box E
Oak Ridge, Tennessee 37830

Re: RI/FS Work Plan Revision 1
U.S. Department of Energy
Feed Materials Production Center
Fernald, Ohio
OH6 890 008 976

Dear Mr. Reafsnyder:

On December 21, 1987, representatives of the United States Environmental Protection Agency (U.S. EPA) met with representatives of the United States Department of Energy (U.S. DOE) regarding the issue of additional off-site soil sampling under the Remedial Investigation/Feasibility Study (RI/FS) for U.S. DOE's Feed Material Production Center (FMPC) in Fernald, Ohio. This meeting was to supplement comments and discussions regarding the RI/FS Work Plan Revision 1 and to assist U.S. DOE in preparing Revision 2. It has been U.S. EPA's position that additional soil sampling is required and U.S. DOE's position that sampling performed to support litigation is adequate to fulfill the needs of the RI/FS.

The disagreement regarding the adequacy of the existing data for off-site soil sampling seems to focus on U.S. DOE's preference to rely on a sparse data base and the use of mathematical probability modeling to characterize off-site soil contamination within a certain degree of confidence. After review of U.S. DOE's additional information, it remains U.S. EPA's position that additional sampling data is required for Phase I of the RI, particularly at the site boundary. Currently, proposed soil sampling density abruptly decreases at the site boundary. U.S. EPA's position was communicated to U.S. DOE staff at the January 12, 1988, monthly Technical Information Exchange meeting. The details of these requirements are presented below:

1. Soil sampling frequency along the entire northern and eastern boundary of the site is required in order to increase sampling frequency from one per 1000 feet to one per 250 feet. U.S. EPA

estimates that approximately thirty (30) additional samples would satisfy this requirement. This additional data would allow the definition of a possible plume pattern that may have crossed the site boundary by conducting a transect survey using the same sampling procedures and analysis as performed in the 1986 litigation-support sampling. If the Phase I sampling and analysis reveals the presence of a plume, additional off-site soil sampling would then be required. This is consistent with other aspects of the RI;

2. Approximately ten (10) additional soil off-site soil samples are required east of the incinerator. These should be located in the transition zone between the last 300 foot-wide walkover radiological survey strip and the nearest 1984/1986 off-site sampling locations that are approximately 2,400 feet apart. The purpose of this additional data is to verify that soil uranium concentrations drop off smoothly from the reference level of 35 pCi/g to the lower levels found in the 1986 litigation-support investigation; and

3. Certain off-site areas near the site boundary appear to have been omitted in the 1984 and 1986 sampling efforts. The approximate coordinates of the omitted sampling locations are as follows:

N-S	E-W
491250	1384500
491250	1382000
488750	1387000
488750	1384500
488750	1382000
488750	1379500
482250	1387000
487500	1374250
485000	1374250
482500	1374250
480000	1374250
487500	1371750
485000	1371750
482500	1371750
472500	1385750
474000	1376500

Additional sampling at these locations is required to support the probability krieging analysis confidence levels and the 2,400 foot spacing between sample locations. Samples may be collected within a 300 foot radius of each of these locations in order to locate an undisturbed site.

Responses to the above comments should be incorporated into Work Plan Revision 2. Also, U.S. EPA is still considering splitting samples with U.S. DOE and/or independent verification sampling for off-site soil sampling.

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If there are any question regarding these comments, please contact Catherine McCord at (312) 886-4436.

Sincerely yours,

Wm. E. Muno

William E. Muno, Chief
RCRA Enforcement Branch

cc: Margaret Wilson, U.S. DOE

Graham Mitchell, OEPA-SWDO

Michael Savage, OEPA-CO

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