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DISAPPROVAL OF REMOVAL ACTION NUMBER 15 WORK PLAN, SCRAP METAL PILES

03-04-92

USEPA/DOE-FN
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LETTER

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 04 1992

REPLY TO THE ATTENTION OF:

HRE-8J

Mr. Jack R. Craig
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

RE: Disapproval of Removal Action Number 15 Work Plan, Scrap Metal Piles

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Removal Action Number 15 Work Plan, Scrap Metal Piles. Basically this Work Plan describes how a contractor will be selected to manage scrap metal piles at the facility. However, the Work Plan lacks sufficient detail regarding how this task will be accomplished by the contractor, and according to what schedule. U.S. DOE must submit an additional Work Plan once a contractor has been selected to perform the activities required pursuant to this removal action.

Therefore, U.S. EPA disapproves the Work Plan pending incorporation of responses to the attached comments.

Please contact me at (312/FTS) 886-0992 if you have any questions.

Sincerely,

James A. Saric
Remedial Project Manager

Enclosure

cc: Graham Mitchell, OEPA-SWDO
Pat Whitfield, U.S. DOE-HDQ

(janke) partial action response to doe-BJ-92 (3893)

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ATTACHMENT

SCRAP METAL PILES
REMOVAL ACTION NO. 15 WORK PLAN REVIEW COMMENTS

[redacted]

GENERAL COMMENTS

1. The removal action (RA) Work Plan does not detail the sampling approach, sampling procedures, or analytical or screening methods that will be used to characterize the scrap metal. Section 4.0 indicates that a project-specific sampling and analysis plan will be provided by the U.S. Department of Energy's (DOE) subcontractor before field activities are initiated. The sampling and analysis plan will then be reviewed and approved by DOE. However, an adequate sampling and analysis plan will be required before the U.S. Environmental Protection Agency's (EPA) approval.

2. DOE invokes the emergency response procedures of the National Oil and Hazardous Substance Pollution Contingency Plan (NCP), 40 CFR 300.415(b)(2), to justify conducting the RA on an expedited basis. This justification does not seem appropriate, considering the fact that DOE has not completed its removal site evaluation (RSE) for the site. It would be more appropriate to complete the RSE, initiate an action memorandum, then conduct the RA, a procedure DOE uses for other RAs.

3. The RA work plan should include provision for providing reports to the EPA. Also, the RA work plan must include an interim data transmittal and a final RA report as a project deliverable. At a minimum, the interim data transmittal should include unvalidated data and any deviations or modifications to the RA work plan. At a minimum, the final RA work plan should include all validated data, a description of sampling locations, a description of sampling and removal activities, conclusions and recommendations (including a description of the limitations of the completed RA), and a description of any issues and their resolution during the RA or issues that may require additional investigation or RA outside of the scope of the RA work plan.

[redacted]

4. Quality assurance (QA) criteria should be specifically referenced and should include the following: (1) data quality objectives; (2) analytical parameters and procedures; (3) QA objectives for quantitative limits, precision, accuracy, completeness, representiveness, and comparability; (4) calibration procedures and frequencies; (5) sample custody, preservation, containerization, and holding time procedures; (6) field QA sampling procedures and frequencies for trip blanks, field blanks, and field duplicates; (7) sampling network rationale and design; (8) internal quality control (QC) checks; (9) data reduction, validation, and reporting procedures; (10) system and performance audits; (11) preventative maintenance procedures; (12) specific routine procedures to assess data precision, accuracy, and completeness; (13) corrective action protocols; and (14) QA procedures to report to management.

5. The RA work plan schedule (Section 3.3) is contingent on EPA approval of the RA work plan before the subcontractor's submittal of key work-plan-related documents. The RA work plan must be complete document and specify the subcontractor, the subcontractors sampling methods, and the subcontractors procedures, before EPA can approve it.

SPECIFIC COMMENTS

1. Section 1.0, page 1, second full paragraph: To comply with NCP [40 CFR 300.415(a)(1], the RSE should first be completed, and then an action memorandum should then be completed that determines the appropriate extent of action. If an RA is necessary, then the RA work plan should be finalized.

2. Section 1.3, page 5, fourth full paragraph: DOE states that "elevated uranium concentrations in fugitive airborne releases have been detected near the scrap metal piles." Analytical results for samples from Air Monitoring Location No. 9 are cited as evidence of release from the scrap metal piles. EPA notes that only one of the nine site area air

monitoring locations (Air Monitoring Location No. 9) is close to the facility. This air monitoring location is also downgradient of other suspected site sources. It does not appear justified, at this time, to initiate an emergency response action based on air monitoring information that cannot be tied directly to the scrap metal piles. As noted above, the RSE should be completed and evaluated before initiating this RA.

3. Section 1.4, page 7, first full paragraph: As noted in General Comment No. 2, DOE invokes the emergency response criteria of the NCP to justify the RA. EPA notes that an RSE has been initiated and its findings should be evaluated before conducting the RA.

4. Section 1.5, page 8, first full paragraph: DOE has not provided convincing evidence that the scrap metal piles are the "source term" for "unacceptable" exposure. DOE should indicate that the scrap metal piles are one potential source and either define "unacceptable exposure" or remove this term from the work plan.

5. Section 2.0, page 8, fourth full paragraph: DOE should provide the specific criteria for determining unrestricted release of recovered metals.

6. Section 2.0, page 8, last paragraph: The scope of the RA is inadequately defined; it seems wholly contingent on responses to the request for proposal (RFP). DOE should more clearly define the scope of the RA.

7. Section 2.1, page 9, fourth full paragraph: DOE states that the "subcontractor must be fully operational within 45 days after the contract is awarded." This schedule does not allow for EPA review and approval of proposed subcontractor's methods that include the work plan's scope of work and the site specific sampling plan.

8. Section 3.3, page 13, first full paragraph: The schedule incorrectly presents work plan approval before award of the RFP and submission and

review of subcontractor documents. Also, the schedule should include the delivery of a final RA report.

9. Section 4.0, page 13, second full paragraph: As noted in General Comment No. 1, the sampling plan must be more detailed. It should, at a minimum, include sampling methods, rationale for target compounds, data quality objectives, the sampling approach and rationale, sample handling procedures, method detection limits, analytical methods, analytical laboratories, anticipated sample numbers and locations, and data quality procedures (and frequencies) for field duplicates, blanks, and matrix spikes.

COMMENTS ON THE FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
"SCRAP METAL PILES, REMOVAL ACTION NUMBER 15 WORK PLAN"
FEBRUARY 1992

General Comments:

Removal Action, section 2.0--This work plan describes the proposed activites to implement the removal action for the Scrap Metal Piles (Removal Action #15) at the FEMP. The disposition of the recoverable scrap metals (ferrous, non-ferrous and copper) constitute this removal action. This removal action is to be accomplished with the use of commercial services selected by the DOE; interested bidders submitted proposals based upon the Request for Proposal (RFP), which states the tasks involved in the removal action, issued by the DOE.

This work plan does not clearly state the means by which the removal action is to be implemented. The work plan states that the subcontractors for both phases of activities are to generate, for DOE approval, task specific work plans prior to beginning work on the FEMP site. Since the subcontractor-generated task specific work plans will contain significant information on the processing of roughly 7000 tons of scrap metal, with much of this metal being radiologically contaminated, these task specific work plans should also be approved by the USEPA and the Ohio EPA. The Removal Action Number 15 Work Plan should clearly state this if it is to be approved by the USEPA.

Specific Comments:

Page 4, section 1.2, para. 1--Uranium concentrations of the copper ingots should at very least be roughly stated to offer insight on the difficulty in their disposition.

Page 4, section 1.2, definitions--When defining "HIGH-COUNT" and "LOW-COUNT," the full terms "HIGH-COUNT SCRAP METAL" and "LOW-COUNT SCRAP METAL" should be used with the stated definitions. Unless the instrumentaion to detect alpha contamination is calibrated to a specific radioisotope, "disintegrations per minute" cannot be measured for that isotope. The general practice in measuring alpha contamination is to take measurements in "counts per minute" when a variety of contaminates are involved. The term "probe area" should be replaced with "window area" to clearly indicate the active part of the alpha detector. Further, the units used to state the window area should be shown in parantheses just as "dpm" is indicated.

Page 8, section 2.0, para. 3--Since the DOE cannot presume all aspects of the submitted proposals, but can only conceptualize the aspects, the review process by a Source Evaluation board should be detalied. It is important that the criteria for selecting the subcontractors is explained since the DOE is not clear as to what disposition methods are to be implemented, but only those methods which are to be emphasized.