

3013

**CONDITIONAL APPROVAL BACKGROUND
SAMPLING PLAN**

03/18/92

**OEPA/DOE-FO
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LETTER**



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

March 18, 1992

RE: CONDITIONAL APPROVAL
BACKGROUND SAMPLING PLAN

Mr. Jack R. Craig
Project Manager
U.S. DOE FEMP
P. O. Box 398705
Cincinnati, Ohio 45239

Dear Mr. Craig:

The purpose of this letter is to conditionally approve the CERCLA/RCRA background sampling plan. The conditions are that DOE address, to Ohio EPA's satisfaction, the comments listed below:

Cover Letter

1. The literature values and other site data to be used for determining background for the OU2 RI should be included in the revision of this sampling plan.
2. The data from this background sampling should be available for inclusion in the OU4 RI. The sampling results should be available in at most seven months and the OU4 RI is not due to the EPAs for twelve months (3/19/93). Five months should be sufficient for inclusion of the background data into the OU4 RI. The inclusion of this data will be critical if results are significantly different from reference source background values used.

Sampling Plan

1. Section 2.1, pg. 2: In order to provide better background information as well as information which may be useful during statistical analysis, a SCS soil survey map should be included to define the soil type for the background locations chosen. Each sampling location should be defined as a specific soil type. This information will be useful in evaluating statistical outliers and the variability in the surface soil sampling results.
2. Section 3.4, pg. 12: Analytical test methods for the parameters listed in Table 1 are not specified within the revised plan. Are selected test methods the same as those listed in the original plan?

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3. Section 3.4, Table 1, pg. 13: Why have 7 inorganics listed as parameters in Table 1 of the original plan, (Boron, Calcium, Cyanide, Iron, Magnesium, Potassium, Silicon, Sodium) been deleted from Table 1 of the revised sampling plan?
4. Section 3.4, pg. 12 & 13: It is not clear to Ohio EPA why analytical detection limits have been specified in Table 1. Shouldn't the detection limits for a particular parameter be specified by the laboratory at the time of analysis?
5. Section 3.4, Table 1, pg. 13:
 - a) DOE should add Bismuth-214 to the analytical parameters. Bi-214 has been detected in both the active flyash pile and the K-65 residues.
 - b) Why are no potential levels of concern provided for selenium, copper and cobalt?
6. Section 4.1, pg. 15, 3rd paragraph: What guidance is DOE using to justify the use of a 95 percent confidence limit for background concentrations? DOE should provide a reference for the use of a 95th percentile upper tolerance limit.

If you have any questions, please contact Tom Schneider or me.

Sincerely,



Graham E. Mitchell
Project Manager

GEM/bjb

cc: Tom Schneider, DERR
Jenifer Kwasniewski, DERR
Jim Saric, U.S. EPA
Dennis Carr, WEMCO
Lisa August, GeoTrans
Tom Hahne, PRC
Robert Owen, ODH