

3023

R-009-207.44

**REVISED PART 5 WORK PLAN AND  
TRANSMITTAL OF REVISED HYDROPUNCHING  
PROCEDURE**

03/20/92

**USEPA/DOE-FO**

**13**

**LETTER**

**OU5**



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

AK  
Mar 26 5 00 PM '92

3023

MAR 20 1992

REPLY TO THE ATTENTION OF:

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

HRE-8J

RE: Revised Part 5 Work Plan and  
Transmittal of Revised  
Hydropunching Procedure

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Proposed Modifications to Part 5 Work Plan and Transmittal of Revised Hydropunching Procedure for the South Groundwater Plume Removal Action.

The revised Work Plan with proposed modifications was submitted in four enclosures. U.S. EPA hereby disapproves the revised Work Plan pending submission and 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

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

ATTACHMENT

COMMENTS ON THE U.S. DEPARTMENT OF ENERGY'S (DOE)  
PROPOSED MODIFICATIONS TO PART 5 OF SOUTH GROUND-WATER  
PLUME REMOVAL ACTION NO. 3

3023

Enclosure 1: Responses to U.S. Environmental Protection Agency (EPA) Comments

1. The response to EPA comment no. 1 states that DOE will provide a Document Change Request (DCR) to address EPA's comments. This response can only be evaluated after EPA review of the DCR.
2. The response to EPA comment no. 2 states that a rinse and wipe decontamination procedure is sufficient to adequately decontaminate the soil gas probe. The DCR describing this procedure was not presented to EPA for review; thus, EPA cannot comment on the procedure. EPA notes that proper decontamination is necessary to prevent possible false positive results when the soil gas survey is implemented. Because high pressure steam cleaning will volatilize the target organic contaminants, it is the preferred method of decontamination and should be used.

Enclosure 2: Hydropunch II Sampling

3. The revised procedure for collecting ground-water samples with the hydropunch sampler is adequate; however, the procedure indicates that ground-water samples will be collected from only one depth-discrete zone per location. This is different from the original sampling approach, under which multiple depth-discrete zones were to be sampled at each location. DOE should provide additional information on the rationale for changing the sampling approach.

Enclosure 3: Concerns on Implementing Part 5 of the Removal Action

4. DOE states that permanent monitoring wells on the Delta Steel property are needed to confirm that the interim advanced wastewater treatment (IWWT) design is adequate. DOE also states that, because it cannot obtain access to the Delta Steel property to install these wells, their usefulness is now questionable. It does not seem that by omitting these wells DOE has solved the problem of obtaining data vital to the successful design of the removal action. Although Delta Steel will not provide access for permanent wells, DOE could obtain the necessary data by collecting ground-water samples using the hydropunch method or temporary wells.
5. DOE states that the recovery well field has "now been moved significantly farther north...." This new location should be clearly identified for evaluation.

Enclosure 4: Proposed Modifications to Part 5 of the Removal Action

6. The proposed modifications in this enclosure appear justified; however, the location of the well field should be clearly identified.