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**UPDATE ON AGENCY CONTACT, USEPA-REGION  
5 & OHIO EPA**

**07/15/88**

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LETTER  
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Department of Energy

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July 15, 1988  
DOE-1131-88

Mr. William E. Muno, Chief  
RCRA Enforcement Section  
U. S. Environmental Protection Agency  
Region V, 5HS-12  
230 S. Dearborn Street  
Chicago, IL 60604

Dear Mr. Muno:

**UPDATE ON AGENCY CONTACT, USEPA-REGION 5 & OHIO EPA**

This letter documents the content and conclusion of telephone conversations conducted with Ohio EPA and USEPA-Region 5 on May 31, 1988 and June 1, 1988, respectively.

**BACKGROUND**

During the past two months, FMPC has met with some difficulty in obtaining the approval of Delta Steel to install a two well cluster of Delta Steel property to support the ongoing FMPC RI/FS. During a recent review of tax maps, WMC0 personnel noted that an alternate well location, approximately 75 yards north of the originally proposed well cluster location, would be located on land owned by Knollman Farms, Inc. Based on the success we have realized in obtaining Knollman Farms, Inc. approval for the installation of other well clusters, FMPC decided, after a hydrogeologic evaluation of the alternate well location, to seek regulatory agency approval to utilize the alternate well location.

**DISCUSSION**

FMPC representatives contacted Rich Bendula of Ohio EPA, on May 31, 1988 to obtain approval to proceed with the installation of a two well cluster at the alternate well location. Following a brief description of the FMPC proposal, Mr. Bendula indicated that he had also noted the suitability of the alternate well location during a recent visit to the area, but was unaware that this parcel of land was not also owned by Delta Steel. Mr. Bendula, therefore, approved the FMPC proposal to use the alternate well location on the condition that Catherine McCord of USEPA-Region 5 also concur.

On June 1, 1988, FMPC initiated a call to USEPA-Region 5. Personnel participating in the call included Chris Aas, Bob Conner, and Richard Heath of WMCO; Roger Wu of DOE; and Catherine McCord and Jim Bennetti of USEPA-Region 5.

Following a briefing of the previous day's conversation with Rich Bendula of Ohio EPA, Catherine McCord approved the use of the proposed alternate location for the two well cluster previously proposed for installation on Delta Steel property.

#### ADDITIONAL DISCUSSIONS:

In addition to the above, the following three additional topics were discussed and agreements reached during the discussion with USEPA-Region 5.

#### K-65 Probe Sampling

During the month of June, FMPC plans to inspect the interior surfaces of the K-65 silos using a video camera. The USEPA-Region 5 has already approved this effort.

Immediately following the video inspection, however, FMPC would like to perform a probe sampling of the materials contained in the upper portions of the silos. Information obtained from this effort can be used to support engineering efforts for the full depth sampling of the silo contents which is to be performed later this year. Following a brief description of the probe sampling techniques to be employed, Catherine McCord approved the FMPC proposal to obtain probe samples of the K-65 samples.

#### Additional Wells

During May, in an effort to obtain landowner approvals for the installation of off-site wells, DOE provided an RI/FS off-site well location map to the technical advisors for the attorneys, Wait, Schneider, Bayless and Chesley, representing the citizens group in litigation against Fernald. The technical advisors agreed with the off-site well locations proposed in the RI/FS Work Plan but suggested that an additional two well cluster be installed in the north east quadrant approximately one mile from the center of the FMPC site. The Ohio EPA and the USEPA-Region 5 endorsed this recommendation and passed it along to the DOE-Site Office during the May 17, 1988 Technical Information Exchange.

On May 27, 1988, representatives from Ohio EPA and the FMPC inspected the terrain in the northeast quadrant and agreed upon a suitable location for the proposed well cluster if they were to be installed. During the June 1, 1988 conversation with USEPA-Region 5, Roger Wu of the DOE-Site Office offered to install the two well cluster if the USEPA-Region 5 agreed that DOE could proceed immediately with installation of the two well cluster provided that a future addendum to the Work Plan would identify the location and installation technique used for the new cluster.

#### CIS Backup Data

In May, the FMPC provided a microfiche copy of all Characterization Investigation Study (CIS) backup data to the USEPA-Region 5. During the May 17, 1988 Technical Information Exchange, Catherine McCord requested that a hardcopy of all the data be transmitted to her office. A hardcopy of the CIS backup data consists of 49 volumes and completely fills a five drawer filing cabinet. It was therefore recommended to Catherine McCord that hardcopies of the data be maintained at the FMPC. If necessary, portions of the data can be copied at anytime and forwarded to the USEPA-Region 5. Catherine McCord agreed with the FMPC proposal.

#### SUMMARY AND CONCLUSION

On June 1, 1988 FMPC personnel contacted USEPA-Region 5 to discuss four technical issues regarding activities currently underway at the FMPC. The following summarizes agreements reached during that telephone conversation.

- Catherine McCord approved the use of the proposed alternated location for a two well cluster preciously proposed for installation of Delta Steel Property.
- Catherine McCord approved the WMCO proposal to obtain probe samples of the K-65 silos.
- Catherine McCord agreed that DOE could proceed immediately with installation of an additional two well cluster located northeast of the FMPC site provided that a future addendum to the Work Plan would identify the location and installation technique used for the new cluster.

- Catherine McCord agreed that the DOE need not forward a hardcopy of all CIS backup data to USEPA-Region 5.

If there are any questions on the agreements as we have interpreted them, please contact Mary Stone of our staff (513) 738-6656, so that we all are in accord on all actions taken.

Sincerely,



*for* James A. Reafsnyder  
Site Manager

DP-84:Stone

cc: C. McCord, USEPA-5  
G. Mitchell, OEPA-Dayton  
M. Wilson, SE-31, ORO  
C. R. Conner, WMCO