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**RESPONSE TO COMMENTS ON SOIL AND  
RUBBLE SAMPLING AND ANALYSIS PLAN  
(REVISION 2) AND REVISED WORK PLAN FOR  
PARTS 2 AND 3 OF THE SOUTH GROUNDWATER  
CONTAMINATION**

**10/14/92**

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LETTER  
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**Department of Energy**  
**Fernald Environmental Management Project**  
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OCT 14 1992

DOE-0113-93

Mr. James A. Saric, Remedial Project Director  
U.S. Environmental Protection Agency  
Region V - 5HR-12  
230 South Dearborn Street  
Chicago, Illinois 60604

Mr. Graham E. Mitchell, Project Manager  
Ohio Environmental Protection Agency  
40 South Main Street  
Dayton, Ohio 45402

Dear Mr. Saric and Mr. Mitchell:

**RESPONSE TO COMMENTS ON SOIL AND RUBBLE SAMPLING AND ANALYSIS PLAN (REVISION 2) AND REVISED WORK PLAN FOR PARTS 2 AND 3 OF THE SOUTH GROUNDWATER CONTAMINATION PLUME REMOVAL ACTION**

- Reference: 1) Letter, J. A. Saric to J. R. Craig, "Response to Comments on Parts 2 and 3 of the South Plume Removal Action," dated June 22, 1992
- 2) Letter, G. E. Mitchell to J. R. Craig, "Acceptable Document Responses," dated June 1, 1992

Enclosed are the response to the United States Environmental Protection Agency (U.S. EPA) comments on Revision 2 of the Soil and Rubble Sampling and Analysis Plan (Enclosure 1) and Revision 2 of the Part 2 and Part 3 Work Plan which includes Revision 3 of the Soil and Rubble Sampling and Analysis Plan (Enclosure 2).

The U.S. EPA has conditionally approved the work plan pending the incorporation of comments (Reference 1). Revision 3 of the Soil and Rubble Sampling and Analysis Plan incorporates the responses to the comments. The Ohio Environmental Protection Agency (OEPA) had previously approved the document without any comments (Reference 2). Revisions to the work plan are shown highlighted and the deleted text struck out to facilitate review.

Please note that since the Removal Action No. 17, Improved Storage of Soil and Debris, Work Plan has yet to be approved, extensive revisions were required to adequately outline the steps that will be taken for waste characterization and disposition of soils. Subsequently, the Soil and Rubble Sampling and Analysis

Plan has been restructured, and where necessary, additional newly written sections have been added to address these concerns. Of specific note is the handling of Fernald Environmental Management Project (FEMP) off-site property soils which will require further sampling prior to final disposition. As a result, revisions to the plan have not been shown in the usual highlight and strike-out format.

If you or your staff have any questions, please contact me at FTS/Commercial 513/738-6159 or Carlos J. Fermaintt at FTS/Commercial 513/738-6157.

Sincerely,

*Johnny Reising*

*for* Jack R. Craig  
Fernald Remedial Action  
Project Manager

FN:Fermaintt

Enclosure: As Stated

cc w/encs.:

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RESPONSE TO U.S. EPA COMMENTS ON  
SOUTH GROUNDWATER CONTAMINATION PLUME REMOVAL ACTION,  
PART 2/3 SOIL AND RUBBLE SAMPLING & ANALYSIS PLAN

Commenting Organization: USEPA

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**General Comment:**

Several responses now reference the Removal Action 17 work plan for waste characterization and disposal methods. Although the approach seems adequate the Removal Action 17 work plan is not likely to be approved by the time this work begins. Therefore U.S. DOE must include more specific information regarding waste characterization and disposition in the Part 2 and 3 work plan.

**Response:**

More specific information has been provided in the revised Soil and Rubble Sampling and Analysis Plan.

**Action:**

Text has been added for clarification.

**Comment #1 (Previous Comment No. 10: Section 2.2. Page I-3):**

The sampling and analysis plan does not identify the required data quality analytical levels. U.S. DOE should clearly indicate the data quality levels and provide the data quality objectives used to establish the levels.

**Response:**

To ensure that the quality of data required is obtained, analytical levels have been established and indicated in the sampling plan. The RI/FS QAPP, which is the official quality assurance program plan for the FEMP Site activities, is referenced and provides the data quality objectives which were used to establish these levels.

**Action:**

The document has been revised as noted in the response.