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**COMMENTS ON THE OU #3 FIELD WORK
PACKAGE**

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11/19/92

**USEPA/DOE-FN
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LETTER**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

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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

[REDACTED]
[REDACTED]
U-005-305, 9

RE: Comments on the OU #3 Field
Work Package

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Draft Operable Unit #3 Field Work Package (FWP). The purpose of the draft FWP was to provide a specific example of the level of detail necessary for samplers to collect Remedial Investigation (RI) field samples.

Although the FWP is generally adequate U.S. EPA has enclosed a few 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

OPERABLE UNIT (OU) 3 FIELD WORK PACKAGE (FWP)
BUILDING 39A - DRUM DRYER

GENERAL COMMENTS

1. The U.S. Department of Energy (DOE) submittal is generally adequate. However, the FWP will require some additional information. A primary function of the FWP is to provide samplers with sufficient information to conduct the required sampling in a manner consistent with the OU 3 Remedial Investigation (RI) Work Plan and the Site-Wide Quality Assurance Project Plan (QAPjP). To do this, the FWP must provide clear guidance for conducting field screening surveys as well as action levels that will require sample retention and analysis. For example, the FWP does not describe the density of sample points, the rationale for taking additional or fewer measurements, or the rationale for choosing which survey meter to use, such as X-ray fluorescence, radiation meter, colorimetric tube, or swipes. The procedures used to characterize each media within a component should clearly be provided.
2. The FWP identifies most media that will require sampling. However, insulation, a potentially important media, is not included. DOE should identify sampling procedures for insulation or justify omitting insulation from sampling.
3. The FWP does not provide a data-recording mechanism for field screening information. The FWP does not provide designated sample numbers or field data sheets for recording survey data output. DOE should provide a mechanism for recording information needed to justify sample data in the future or for making assumptions about the nature and extent of contamination.

SPECIFIC COMMENTS

1. Page 1 of 38, Section 1.0, Paragraph 1. Building insulation is listed as a structural component. However, no sampling of insulation is included. Because insulation is a porous material and is likely to be contaminated, it should be sampled. DOE should include procedures for sampling building insulation.
2. Page 1 of 38, Section 2.0, Paragraph 3. The text should indicate that the number of duplicates will be 1 per every 20 or fewer samples per media. Also, the minimum number of trip and field blanks should be provided along with the sampling procedures.
3. Page 4 of 38, Table 1. Table 1 indicates that there are no designated sample numbers for survey samples. Also, the table suggests that composite swipe samples will be collected from locations that exceed pre-established decision levels. A sample numbering system for survey sample results should be provided, and the pre-established decision levels should be specified.
4. Page 8 of 38, Table 5. Table 5 provides a list of equipment; however, no equipment is specified for use in the FWP. Table 5 should be completed to include the required equipment.