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**OU #2 SAMPLING AND ANALYSIS PLAN
ADDENDUM AND REPORT FOR WELL 1433**

11/19/92

**USEPA/DOE-FN
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LETTER**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

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CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:

NOV 19 1992

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

HRE-8J

RE: OU #2 Sampling and Analysis
Plan Addendum and Report for
Well 1433

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Operable Unit (OU) #2 Sampling and Analysis Work Plan Addendum and Report for Well 1433 in the South Field Area. The review appears to have identified a data gap in the Remedial Investigation (RI) report for OU #2.

Enclosed are U.S. EPA's comments on the Report. The United States Department of Energy must provide information regarding the potential data gap to supplement the OU #2 RI report.

Please contact me at (312/FTS) 886-0992 if you have any questions.

Sincerely,

James A. Saric
Remedial Project Manager

Enclosure

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DEC - 1 1992
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FERNALD

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

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OPERABLE UNIT (OU) NO. 2 SAMPLING AND ANALYSIS WORK PLAN ADDENDUM
AND REPORT FOR WELL 1433 IN THE SOUTH FIELD AREA

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GENERAL TECHNICAL COMMENTS

1. The U.S. Department of Energy (DOE) submittal includes the following: (1) a cover letter dated September 30, 1992; (2) Attachment I, the Well 1433 Sampling and Analysis Plan, and (3) Attachment II, the Well 1433 Field Installation Report. The sampling plan is dated September 1992, while the report is undated but includes a portion of the Consolidated Consent Agreement/Federal Facility Compliance Agreement (CCA/FCA) Monthly Report for August 1992. This monthly report addresses sampling for OU2, Well 1433. Because of the format and date of the documents, DOE's intent is unclear. DOE apparently attempted to install Well 1433 to obtain more information on the source of uranium contamination in the South Field Area of OU2; however, Well 1433 was installed as a dry well and no sample was collected. DOE attached the information from the monthly report to document the well installation. U.S. EPA believes that this approach is unacceptable. At a minimum, DOE should submit a report that (1) summarizes deviations from the sampling plan and the impact of these deviations on the data quality objectives; (2) identifies data gaps; (3) provides recommendations for resolving data gaps.
2. DOE identifies a sampling approach that includes sampling soil and ground water from Well 1433. The reasons for not sampling ground water are clear: the well was dry; however, the reasons for not sampling soil are not provided. DOE should explain why soil sampling was not conducted, identify it as a data gap, and assess the significance of the data gap.
3. DOE identified a perched water zone in Boring 1401 that was abandoned because of health and safety considerations. Well 1433 was installed in

close proximity to Boring 1401, but did not contain perched water. DOE should discuss possible explanations for this difference.

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4. The original purpose for installing Boring 1401 and Well 1433 was to further characterize the source of contamination noted in Well 2406 and to characterize leachate near the boundary of the inactive fly ash pile. DOE should discuss the implications that this data gap will have on the OU 2 RI, particularly, on factors that will affect source characterization.
5. The date on the addendum to the sampling and analysis plan is later than the date on the monthly report describing the findings of sampling activities. DOE should explain this discrepancy.

SPECIFIC TECHNICAL COMMENTS

1. Attachment 1, Page 3, Paragraph 6. The text clearly states that fill and soil samples will be screened using a photoionization unit and pancake beta/gamma meters. The sample exhibiting the highest radiological reading will be submitted for full radiological analysis. Attachment 2 (the monthly report), does not indicate whether samples were collected and submitted for analysis. DOE should clearly indicate, in the report, whether samples were collected and, if not, indicate the implications of this deviation from the sampling and analysis plan.
2. Attachment 1, Page 4, Paragraph 2. The text states that a report will be generated including boring logs, well installation details, request for analysis forms, chain-of-custody forms, and the interpretations of the geologist. Attachment 2 includes only a short summary extracted from the August monthly report and attached boring logs. DOE should provide a separate report meeting the requirements identified in General Comment No. 1, above.
3. Attachment 1, Table 1. This table identifies data quality objectives for the installation of Well No. 1433. DOE should indicate whether or

not these data quality objectives were met; if not, DOE should identify the data gaps and implications.

4. Attachment 2, Page 12, Paragraph 3. DOE indicates that Monitoring Well No. 1433 will be plugged and abandoned. It is possible that perched water may accumulate on a seasonal basis or during periods of abundant precipitation. DOE should consider leaving the well in place to evaluate whether or not perched water accumulates in the future.