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**CORRECTION OF RESPONSES RELATED TO
PERFORMANCE SPECIFICATIONS ON
ANALYTICAL METHODS IN THE SITE WIDE
COMPREHENSIVE ENVIRONMENTAL RESPONSE
COMPENSATION AND LIABILITY ACT QUALITY
ASSURANCE PROJECT PLAN**

05/19/93

**DOE-FN/EPA
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LETTER**



Department of Energy
Fernald Environmental Management Project
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MAY 19 1993

DOE-2021-93

Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V - 5HRE-8J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

Mr. Graham E. Mitchell, Project Manager
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402-2086

Dear Mr. Saric and Mr. Mitchell:

CORRECTION OF RESPONSES RELATED TO PERFORMANCE SPECIFICATIONS ON ANALYTICAL METHODS IN THE SITE WIDE COMPREHENSIVE ENVIRONMENTAL RESPONSE COMPENSATION AND LIABILITY ACT QUALITY ASSURANCE PROJECT PLAN

Reference: Letter, DOE-1816-93, from J. R. Craig to J. A. Saric; "Fernald Environmental Management Project Site-Wide CERCLA Quality Assurance Project Plan (SCQ)" dated April 29, 1993.

The purpose of this letter is to transmit corrections to the proposed changes related to the performance specifications covering the analytical methods in the Site-Wide Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Quality Assurance Project Plan (SCQ). The proposed changes were initially forwarded to you for review in the above referenced letter. After further discussions with representatives from the United States Environmental Protection Agency (U.S. EPA) Quality Assurance Section, it was deemed necessary to modify several of the original responses.

The three responses to be modified, are a result of a telephone conversation between myself and Mr. Al Alwan of the Quality Assurance Section of the U.S. EPA, May 18, 1993. These are comment numbers 1, 7, and 12 on pages 1, 2, and 3 respectively of the comment responses document attached to the referenced letter. Comment number 1 is related to a change in a Table in Appendix D which covers performance criteria associated with Contract Laboratory Program (CLP) Statement of Work (SOW). The modified line shall read as follows:

"69 present (record relative percent abundance) same"

The number 69 relates to the mass to charge ratio (m/z) that must be present. The term "present" in this line reflects this requirement and the parenthetical statement indicates that the relative percent abundance is to be

recorded. The CLP SOW does not state a specific criteria for the percent abundance but does state that the m/z ratio of 69 must be present.

The second modification addresses comment number 7 on page 2 and is related to the preference of SW 846-3540 over SW 846-3550. It is true that SW 846-3550 is the more widely used method, however this is due to the fact that the matrices being addressed are predominantly uniform. The U.S.EPA contention is that SW 846-3540 is more appropriate when the soil matrix is not uniform. United States Department of Energy (U.S. DOE) agrees with this position and agrees to add a foot-note to all tables referencing SW 846-3550 that states method 3550 will be used only for uniform soil matrices and 3540 will be used whenever a non-standard or non-uniform soil matrix is encountered.

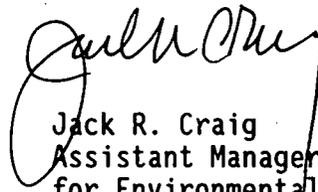
The third modification addresses comment number 12 on page 3 and is related to the understanding that calibration related information shall be included in Project Specific Plans (PSP). The U.S.EPA was correct in that there was an understanding that specific calibration information would not be required in the SCQ since this type of information is germane to a PSP, and there by providing the basis for this comment to be withdrawn. The modification to the comment response is therefore as follows: "As a result of a conference call between U.S. EPA, Department of Energy, Fernald Field Office (DOE-FN), and Fernald Environmental Restoration Management Corporation (FERMCO) on April 22, this comment has been withdrawn by U.S. EPA, based on the understanding that specific calibration information (calibration standards and points) will be included in the PSPs." Since all of the PSP are reviewed by U.S. EPA the calibration information is left to the PSPs where the details can be adjusted to conform appropriately to the DQOs as well as the particular matrices and analytes.

The U.S. DOE considers these recent adjustments related to the Site Wide CERCLA Quality Assurance Project Plan (SCQ) sufficient to achieve final resolution of the outstanding issues, concerning the analytical methods. The SCQ will be considered a final approved document once you have had time to review these changes and are satisfied that these changes reflect what was agreed to in a telephone conversation on May 18, with myself and Al Alwan of your Quality Assurance Section.

The signature page must be signed and included with the final approved SCQ. A complete final document will be transmitted to you after the signature page is signed by the appropriate U.S. DOE, U.S. EPA, and FERMCO representatives.

If you or your staff have any questions, please contact Randy C. Janke at (513) 648-3123.

Sincerely,



Jack R. Craig
Assistant Manager
for Environmental Restoration

FN:RCJanke

cc:

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