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REVISED OU #3 RI/FS WORK PLAN

06/10/93

USEPA/DOE-FN

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LETTER



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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

RE: Revised OU #3 RI/FS Work Plan

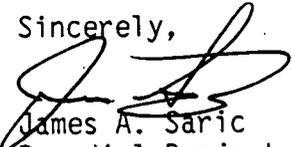
Dear Mr. Craig:

On April 15, 1993, the United States Environmental Protection Agency (U.S. EPA) approved the Responses to Comments (RTC) for the Operable Unit 3 Remedial Investigation and Feasibility Study Work Plan Addendum. On May 14, 1993, U.S. DOE submitted a revised Work Plan.

The Revised document fails to incorporate all of U.S. EPA's previously approved RTC. U.S. DOE must incorporate the attached comments into the final work plan and provide an explanation for the deviations to U.S. EPA within thirty (30) days receipt of this letter.

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

Sincerely,


 James A. Saric
 Remedial Project Manager

Enclosure

cc: Graham Mitchell, OEPA-SWDO
 Pat Whitfield, U.S. DOE-HDQ
 Nick Kaufman, FERMCO
 Jim Thiesing, FERMCO
 Paul Clay, FERMCO

(JANKE(RJ))
 PARTIAL ACTION
 RESPONSE
 to
 DOE-1991-93
 (6229)

REVIEW COMMENTS ON THE "FINAL OPERABLE UNIT 3
FINAL WORK PLAN ADDENDUM"

The "Final Operable Unit 3 Work Plan Addendum" was reviewed and compared with the U.S. Department of Energy's (DOE) Comment Response Package (CRP) dated March 1993. Inconsistencies between the CRP and the Final Operable Unit 3 Final Work Plan Addendum are noted below. DOE should provide an explanation for the changes made to the approved CRP language.

1. Page 2-53, Table 2-6. The final work plan addendum did not incorporate the three redlined items added to Table 2-6 (Page 2-64 of the CRP) that noted areas of potential thorium contamination.

2. Page D.3-4, Airborne Radioactivity Section. The minimum operation time for a general air sampler is 168 hours at a flow rate of 60 L/min in the final work plan addendum, while the CRP shows this minimum to be 24 hours.

3. Page D.3-6, Second Italicized Paragraph. The language in the final work plan addendum is different from the language on Page D.3-7 of the CRP. The CRP language explained the rationale behind the sampling approach in response to U.S. EPA's comment.

4. Page D.4-1, Paragraph 2. The introductory language in the final work plan addendum was changed from the language in the CRP. The reference to the target analyte list was deleted and a new sentence was added on how analytes would be specified.

5. Page D.4-14, Table D.4-4. The Likely Sources for the "Other" Analysis Class in the final work plan addendum are "General industrial (ammonia, sulfides, oils and greases)." On page D.4-15, Table D.4-4 of the CRP, the Likely Sources are "General industrial (inorganic, nitrogen, cyanide, phenols)."
6. Page D.5-11. The sentence that was to be added to the end of Section D.5.1.3.3 was not included. This sentence (the first sentence on page D.5-13 of the CRP) reads "As experience is gained and the application of field portable XRF is developed at the FEMP, it is anticipated that the total analyte list will be expanded."
7. Component-Specific Write-ups of Sampling and Analysis Plan. The CRP (Response #7 in the Responses to General USEPA Comments on the Operable Unit 3 Sampling and Analysis Plan) states that a subsection will be added to the component-specific write-ups. This subsection would include the sentence: "One airborne particulate sample will be collected in the component and analyzed for radiological and inorganic contaminants, as well as asbestos, on the basis of Protocol 1." This sentence was changed in the component-specific write-ups of the final work plan addendum to read "One airborne particulate sample will be collected in the component and analyzed for radiological contaminants on the basis of Protocol 1." It is unclear if inorganic contaminants and asbestos were deleted altogether or whether they are covered elsewhere under a different protocol. DOE should explain why the analytes were deleted.
8. Page D.I-71, Table D.I.3.15. The Highest Allowable Minimum Detectable Concentration (HAMDC) for air filters is 30 picoCuries per filter (pCi/Filter) in the addendum. The CRP

states that the HAMDC concentration is 10 pCi/Filter. However, the table in the final work plan addendum is the same as the ASL B - Gross Beta Activity Table in the Final Site-Wide CERCLA Quality Assurance Project Plan.