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APPROVAL OF THE OU5 GREAT MIAMI RIVERBANK CHARACTERIZATION WORK PLAN FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 15 1993

REPLY TO THE ATTENTION OF:

HRE-8J

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

RE: Approval of OU #5 Great Miami Riverbank Characterization Work Plan Fernald Environmental Management Project

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Operable Unit (OU) 5 Remedial Investigation (RI)/Fesibility Study (FS) Great Miami Riverbank Characterization Work Plan Addendum. The Work Plan Addendum addresses contamination of soil and debris along the west bank of the Great Miami River in the vicinity of the Site.

U.S. EPA hereby approves the Work Plan pending incorporation of the attached comments.

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 kauffman, FERMCO
Jim Thiesing, FERMCO
Paul Clay, FERMCO

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U.S. EPA COMMENTS ON THE GREAT MIAMI RIVERBANK WORK PLAN ADDENDUM

1) Section 3.2.2, Page 12. The Work Plan states that all soil samples will be collected using a split spoon sampler and conventional auger rig. Because of the likelihood of encountering impenetrable materials, U.S. DOE should consider and discuss contingency drilling methods or sample locations that can be used to define the vertical extent of contamination if the primary sampling location proves impenetrable.

2) Table 3-3, Page 13. The text states that all soil borings will be drilled to an approximate depth of 13 feet, to groundwater, or to a impenetrable materials, whichever is encountered first. However, Table 3-3 indicates estimated sampling intervals at boring depths in ranges of 0 to 2, 2 to 4, 4 to 6, 10 to 12, and 12 to 13 feet. It is unclear whether boring depths will be as described in the text or in Table 3-3. U.S. DOE must clearly state the intended boring depths and related sampling intervals.

3) Section 3.6, page 14. As written, the proposed analytical program is unclear. The text should clearly state the specific analytes for which each discreet sample (18-inch aliquot) will be analyzed.

4) Section 4.1, Page 16. This section indicates that groundwater samples will be collected; however, groundwater sampling is not discussed anywhere else in the Work Plan. The reference in this section to groundwater sampling must be deleted.

5) Section 6.1, Page 20. The method used to determine the number of equipment rinsate samples is unclear. The number of equipment rinsate samples is usually one rinsate sample for every 20 samples collected, and equipment is decontaminated between each sample. The text states that equipment rinsates will be collected at rate of 1 per 20 pieces of a type of equipment cleaned by a specific decontamination method. As written, equipment may not be decontaminated between each soil sample and equipment rinsate samples may not be collected as frequently as necessary. The text must be modified to clarify this statement.