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**APPROVAL OF OU5 PILOT PLAN DRAINAGE  
DITCH AND SURFACE WATER BACKGROUND  
INVESTIGATION ENVIRONMENTAL  
MANAGEMENT PROJECT**

07/22/93

**USEPA/DOE-FN**

**2**

**LETTER**

**OU5**



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

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JUL 22 1993

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: Approval of OU #5 Pilot Plant  
 Drainage Ditch and Surface  
 Water Background Investigation  
 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)/Feasibility Study (FS) Pilot Plant Drainage Ditch Seepage and Surface Water Background Investigation Work Plan Addendum. The Work Plan Addendum addresses contaminant concentrations in seeps and surface water in the drainage ditch west of the Pilot Plant, and to further evaluates background sampling locations in Paddys Run creek and the Great Miami River.

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*  
 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

*(YuraculP)  
 Partial  
 Action Response  
 to DOE-2185-93  
 (10456)*

**TECHNICAL REVIEW COMMENTS ON  
DRAFT OU 5 RI/FS WPA FOR  
PILOT PLANT DRAINAGE DITCH SEEPAGE AND  
SURFACE WATER BACKGROUND INVESTIGATION**

1. **Figure 2-1, Page 3.** Figure 2-1 shows the surface water sample PP-DD-03 collection location as just upstream of SEEP10, the seep furthest upgradient from Paddys Run. Since additional seeps may have formed since the drainage ditch site-walk and to better characterize the drainage ditch background contamination level, an additional surface water sample should be collected at the head of the drainage ditch.
2. **Figure 2-2, Page 7.** Figure 2-2 shows the collection location of the upgradient Paddys Run surface water sample (W-5). To better characterize the pilot plant drainage ditch contribution to Paddys Run contaminant loading, a surface water sample should also be collected from Paddys Run just north (upgradient) of the pilot plant drainage ditch discharge point.
3. **Section 3.3, Page 13.** The text states that the upstream surface water sample collected from the Great Miami River will be analyzed for analytes listed in target analyte list (TAL) 50.03.16D, which does not include radionuclides. Because more recent background data for the Great Miami River is needed for the RI and risk assessment, it is unclear why radionuclides are not included as proposed analytes. The Great Miami River sample should also be analyzed for radionuclides or a justification for omitting radionuclides should be included in the text.
4. **Table 3-3, Page 16.** The appropriate analytical level section of this table indicates that the Great Miami River surface water sample will be analyzed for radionuclides. Section 3.3 indicates that the Great Miami River surface water sample will be analyzed for analytes listed in TAL 50.03.16D, which does not include radionuclides. This discrepancy should be resolved.
5. **Table 7-1, Page 23.** Table 7-1 does not include data validation as an administrative procedure. Table 7-1 should be modified to include data validation activities and the quantity of data to be validated.