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**DISAPPROVAL OF OU5 ADDITIONAL
MONITORING WELL AND WELL
ABANDONMENT WORK PLAN FERNALD
ENVIRONMENTAL MANAGEMENT PROJECT**

07/22/93

USEPA/DOE-FN

3

COMMENTS

OU5



LOG 6-4883
 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 5
 77 WEST JACKSON BOULEVARD
 CHICAGO, IL 60604-3590
 10/10/92
 A.R.
 12 32 PM '93

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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: Disapproval of OU #5 Additional
 Monitoring Well and Well
 Abandonment 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)/Feasibility Study (FS) Additional Monitoring Well Installation and Well Abandonment Work Plan Addendum. The Work Plan Addendum addresses the installation and abandonment of monitoring wells to further support the data needs of the OU 5 RI report.

U.S. EPA hereby disapproves 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

(U/ERADE/P)
 ACTION RESPONSE
 TO S-1891
 (6377)

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**TECHNICAL REVIEW COMMENTS ON
DRAFT OU 5 RI/FS WPA FOR
ADDITIONAL MONITORING WELL INSTALLATION AND WELL ABANDONMENT**

1. **Section 3.1, Page 2.** The text states that soil samples collected from well borings will be analyzed by the FERMC0 laboratory. The FERMC0 laboratory cannot provide data of a quality suitable for use in the risk assessment. Analytical data provided by the FERMC0 laboratory should only be used for site characterization.
2. **Figure 3-4, Page 14.** Using Figure 3-4, it is not possible to determine if the proposed wells are adequate to define the hydrogeology of the area. Figure 3-4 should include the locations of all existing wells. In addition, no wells exist south of the pilot plant. A well should be installed south of the pilot plant to characterize that location.
3. **Section 3.1.7, Page 22.** The text discusses seepage coming through the concrete wall that forms the eastern side of the "former storm sewer discharge structure." This structure is not mentioned anywhere else in the text, nor is it identified in any figure. DOE should provide a figure that identifies all structures mentioned in the text.
4. **Section 3.1.7, Page 22.** The text discusses placement of groundwater wells in the vicinity of the storm water retention basins; however, no discussion of groundwater flow direction in this area is included. This section should include a discussion of groundwater flow direction. If contamination is detected in the storm water retention basin area, wells should be installed to the south and west of the storm water retention basin area.
5. **Section 3.2.3, Page 26.** This section states that well 2397 located southeast of the storm water retention basins is downgradient of the storm water retention basins, which indicates that groundwater flows to the southeast. However, Section 3.2.2 states that groundwater flows to the east-northeast. Discussion of the storm water retention basin area should include a description of groundwater flow, how groundwater flow varies within the area, and how groundwater flow is influenced by seasonal influxes. Because of the variable groundwater flow direction, well 21065 is not necessarily upgradient of well 2397 and the storm water retention basins. Therefore, in addition to well 21065, a well should be installed north (upgradient during the dry season) of the storm water retention basins.

6. Section 3.2.5, Pages 27 and 28. It appears that text is missing from the bottom of page 27 and the top of page 28. The WPA should be revised to include the omitted text.
7. Section 3.2.5, Page 28. The text states that well 3027 will replace well 3084 in terms of its monitoring function. However, Figure 3-8 (page 20) indicates that well 3027 is a damaged monitoring well. This discrepancy should be resolved.
8. Section 3.2.5, Page 28. The text does not indicate whether DOE will use data from well 3084 as representative of the groundwater at that location. The text should be revised to include this information. If DOE does not plan to use the well 3084 data, then a replacement well should be installed in the immediate vicinity of well 3084. Also, the text states that additional Resource Conservation and Recovery Act (RCRA) wells will replace well 3084 in terms of its monitoring function. However, it is difficult to assess whether the RCRA wells will be adequate replacements without a figure showing the RCRA well locations. A figure showing the locations of the RCRA wells should be included in this section.
9. Section 3.2.6, Page 32. The text describes where the well screen will be placed in cases where all Hydropunch samples exhibit background levels and where a single Hydropunch sample has an elevated level of total uranium. However, the text does not identify where the well screen will be placed in the event of elevated uranium levels in multiple Hydropunch samples. This information should be included in the text.
10. Section 6.1, Page 38. The text indicates that equipment rinsate samples will be collected at a rate of one for each 20 washings during soil sampling, but the text does not discuss equipment rinsate samples for groundwater sampling. Equipment rinsate samples should be collected for both soil sampling and groundwater sampling equipment. In addition, the number of equipment rinsate samples is usually one rinsate sample for every 20 samples collected, and equipment is to be decontaminated between samples. The text as it is currently written indicates that equipment may not be decontaminated between samples and that equipment rinsate samples may not be collected as frequently as necessary. The text should be modified to clarify these issues.
11. Section 6.2, Page 38. Section 6.2 is entitled "Training"; however, the text discusses quality assurance audits. The title of this section should be changed to reflect the information presented.