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**DISAPPROVAL OF OU5 ADDITIONAL SOIL
SAMPLING WORK PLAN FERNALD
ENVIRONMENTAL MANAGEMENT PROJECT**

07/22/93

USEPA/DOE-FN

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COMMENTS

OU5



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

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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: Disapproval of OU #5 Additional
Soil Sampling 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) Surface and Subsurface Soil Sampling Work Plan Addendum. The Work Plan Addendum addresses surface and subsurface soil sampling data needs to further support 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-HDO
Nick kauffman, FERMCO
Jim Thiesing, FERMCO
Paul Clay, FERMCO

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PARTIAL
ACTION RESPONSE
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**TECHNICAL REVIEW COMMENTS ON
DRAFT OU 5 RI/FS WPA FOR
SURFACE AND SUBSURFACE SOIL SAMPLING INVESTIGATION**

1. Section 3.1.2, Page 6. Many survey readings shown in Figure 3-3 indicate relatively high levels of uranium contamination along the fence line and railroad spur east of the solid waste landfill. DOE should investigate this area to characterize the soil contamination.
2. Section 3.1.2, Page 11. Soil borings 11091 through 11095 are supposed to define soil contamination around Plant 8. However, borings 11091 through 11094 are all located north of Plant 8; boring 11095 is the only boring located south of Plant 8. Additional borings should be located east, south, and west of Plant 8 to determine the extent of contamination in the Plant 8 vicinity.
3. Section 3.1.3, Pages 11 through 13. The text states that Figure 3-6 shows previous investigation borings containing organic contamination. The text does not reference the previous investigations, and the data presented in Figure 3-6 does not correlate with the data presented in Appendix B (page B-5). These omissions and discrepancies should be addressed.
4. Section 3.1.3, Page 13. The text states that boring 11109 will be sampled to investigate the lateral extent of contamination downgradient of the garage area. In terms of soil contamination, the use of the term "downgradient" is unclear. This statement should be clarified.
5. Section 3.1.4, Page 13. The text states that the graphite furnace and oil burner area are identified in Figure 3-8. The graphite furnace and oil burner area are not identified in Figure 3-8. This discrepancy should be resolved.
6. Section 3.1.4, Page 20. The text indicates that boring 11090 will be located in the same area as boring 1566. However, Figures 3-8 and 3-9 indicate that boring 11090 will be in approximately the same location as boring 1565. This discrepancy should be resolved.
7. Section 3.1.5, Page 20. The text indicates that if split spoon recovery is poor, the boring location will be moved but will remain within a 2-foot radius of the original boring. It is unclear why the boring location would be moved, especially if the original boring has reached a depth greater than 9 feet. Because at depths greater than 3 feet, 6-inch samples are collected every 3 feet, the additional recovery needed for a sample could be obtained from the next

- 6 inches instead of redrilling the boring. DOE should consider this alternative approach.
8. Section 3.1.5, Page 20. The text states that borings will be advanced until they reach groundwater or a total depth of 20 feet. It is unclear why 20 feet was selected as the termination point of these borings. DOE should provide justification for terminating borings at 20 feet.
 9. Section 3.2, Page 22. The text states that radiological data is available for the areas bordering the former production area. However, the text does not state the source of this data, whether the data has been validated, and whether the data is of an analytical level that can be used to support the risk assessment. This information should be included in the text to allow assessment of whether the data is of sufficient quality to support the risk assessment.
 10. Section 3.6, Page 30. The text states that the boring interval with the highest radiological activity or organics field screening results will be sampled. The text does not address the case where the highest radiological activity and highest organics screening results are not common to the same interval. The text should identify the boring interval to be sampled when the highest radiological activity and highest organics screening results are not common to the same interval.
 11. Section 6.1, Page 34. 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 to be decontaminated between samples. The text states that equipment rinsate samples will be collected at a rate of one for each 20 washings. 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.
 12. Section 6.1, Page 34. The text states that two types of quality control (QC) samples will be collected: equipment rinsate samples and trip blanks. The text should be modified to state that three types of QC samples will be collected, and duplicate samples should be added to the list. Also, the duplicate sample collection method described does not correspond with the standard definition of a duplicate sample. Duplicate samples should be aliquots of the same sample, not samples collected from the same depth in adjacent borings. This discrepancy should be addressed.