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**DISAPPROVAL OF OU5 TRAP RANGE WORK  
PLAN ADDENDUM**

08/05/93

USEPA/DOE-FN

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COMMENTS

OU5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
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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 Trap Range  
Work Plan Addendum

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) Work Plan Addendum for the Trap Range at the Fernald Environmental Management Project. The Work Plan Addendum addresses soil contamination in the vicinity of the trap range.

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 Theising, FERMCO  
Paul Clay, FERMCO

(YERACE/P)  
ACTION RESPONSE  
to 5-2016  
(6472)

TECHNICAL REVIEW COMMENTS ON  
DRAFT OU 5 RI/FS WPA FOR  
FEMP TRAP RANGE INVESTIGATION

1. Section 2.1, Page 3. The text states that the corrugated metal shed measures 16 by 17 feet; however, Figure 2-1 shows the shed as 16 by 18 feet. This discrepancy should be resolved.
2. Section 2.1, Page 3. The text states that radioactive contamination will be discussed in Section 2.8. Section 2.8 does not exist, but radioactive contamination is discussed in Section 2.7. The text should be revised to indicate that radioactive contamination is discussed in Section 2.7.
3. Section 2.2, Page 3. The text states that each shotgun shell contained 1.25 ounces of lead. The calculation presented in the text uses 1.125 ounces. The text and calculations should be revised based on 1.25 ounces of lead instead of 1.125 ounces.
4. Section 3.1, Page 11. The text indicates that a metal detector will be used to delineate areas of lead-shot contamination. X-ray fluorescence (XRF) should be considered for use instead of a metal detector because XRF can directly read the lead levels in the soil.
5. Section 3.1, Page 13. The text states that if the metal detector registers readings on its scale in all areas, then a background value will be established by collecting readings at a discrete number of clean locations. The text further states that 30 readings will be taken in clean areas located east, south, and west of the trap range. First, if the metal detector registers readings in all areas, it is unclear what criteria will be used to determine clean areas for establishing background. Second, areas located east and south of the trap range may be contaminated with stray shot. Background locations should be established west and northwest of the trap range.
6. Section 3.2, Page 13. This section refers to Section 2.8, which does not exist. The text should be revised to indicate the correct section number.
7. Section 3.3.2, Page 15. The text states that surface water samples will be collected from standing water near the most heavily contaminated areas. The final report for this project specific plan (PSP) should include a map designating the surface water sampling locations, as the locations of the most heavily contaminated areas and the standing water are not yet known.

8. Section 3.3.2, Page 15. The text does not indicate whether surface water samples will be filtered or unfiltered. Metals would not have time to leach into standing water sampled immediately after a rainfall. Therefore, the text should be revised to indicate that surface water samples will be unfiltered.
9. Section 6.1, Page 21. The text indicates that equipment rinsate samples will be collected at a rate of one for every 20 washings. Equipment rinsate samples should be collected at a rate of one for every 20 samples collected and should be analyzed for the same parameters as the original samples. The text should be revised to address this issue.
10. Section 6.1, Page 21. The text states that duplicate samples will be collected as adjacent samples at surface locations. Duplicate samples should be aliquots of the same sample, not samples collected from the same depth in adjacent borings. This issue should be addressed.