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**REVISED SITE-WIDE QUALITY ASSURANCE
PROJECT PLAN CONDITIONAL APPROVAL**

01/14/94

USEPA/DOE-FN

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COMMENTS



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

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JAN 14 1994

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: Revised Site-Wide Quality
Assurance Project Plan
Conditional Approval

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) revisions to the Site-Wide Quality Assurance Project Plan (SCQ). The SCQ was previously approved by U.S. EPA on June 8, 1993. These revisions reflect changes made as a result of the Fernald Environmental Management Corporation becoming the new restoration management contractor.

Therefore, U.S. EPA hereby approves the SCQ pending incorporation of the attached comments. These comments must be addressed and revisions submitted to U.S. EPA within thirty (30) days receipt of this letter.

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
Jim Theising, FERMCO
Paul Clay, FERMCO



QAS comments on SCQ Fernald DOE, Ohio

1. Section 2.3.3/21, the proposed change need to include that the EPA has to evaluate the radionuclides analyses which the DOE and DOE contractors are using. The analyses and there measurements will be evaluated as part of the DQO for the specific PSP.
2. Section 2.3.3/21, the addition of separate DQO Manual should not eliminate the specific DQOs in each PSP.
3. Section 2.3.3/22, the proposed change of the gross radiological from ASL B to ASL A should be based on the intended data use which must be specifically defined in the specific PSP DQOs.
4. Section 2.3.3/22, the proposed change of adding SW846 methods to ALS B is appropriate only if you relate it to the specific PSP DQOs.
5. Section 2.3.3/22, the use of the field screening ALS A must be viewed in term of the decision making process. The limitation of each technique has to be clearly identified and how they will effect the decision error.
6. Section 3.1.5/5, the specific laboratories that will do the work for the specific PSP DQOs must be specified in each PSP.
7. Section 3.1.4.1/3:
 - a. The DQO Coordinator must implement what has been stated and agreed on in the specific PSP DQOs.
 - b. The DQO Coordinator has to make too many decisions on his/her own which should not be the case. The DQO source and the procedure should be in the specific PSP DQO.
 - c. The specific PSP DQOs should be clear, specific and measurable.
 - d. How the DQOs will be monitored should be stated in each specific PSP.
 - e. The degree of the DQOs satisfaction should be reported for each step of the specific PSP and for the whole PSP.
 - f. What specific decision has to be made for each step should be in each specific PSP.
8. Section 3.1.5.2/5:
 - a. The traceability and accountability will be very hard

QAS comments on SCQ Fernald DOE, Ohio

using this approach.

- b. The evaluation of each PSP will be very hard if the specific laboratory is not included.
 - c. The PSP should have the specific DQO and the laboratory methods that will achieve them.
 - d. The PSP has to be self contained as far as specific for its need and could reference what is common.
- 9. Section 8.4.2/6, for the field techniques the following need to be addressed:**
- a. Specify the limits and the error involved for each technique used.
 - b. Calculate the error in each decision made.
- 10. Section 14.5/3, specify what is the length of the "Project"? Recommend the completeness be measured for each specific PSP.**
- 11. Appendix A/5, specify who is responsible in making the decision on EPA approval applicability. Clearly identify the procedure involved in making the decision.**
- 12. Appendix A/75, the recommended changes and the ASL Table 2-3 should be viewed in the following way:**
- a. The specific decision that has to be made in each specific PSP will decide what specific approach has to be used.
 - b. The specific PSP should have the specific compounds, matrices, limits and the analytical methods that will achieve them.
 - c. The ALS are general and not specific. Their use does not address the specific PSP DQOs and how those will be satisfied. We would like this table to be reflective to this concept.
- 13. Appendix A/91-96, the PSP should have all the laboratories used.**
- 14. Appendix A/112, the addition of new parameters to soil, Table 6-1 need to consider the following:**
- a. The rational for the adding the new compounds.

QAS comments on SCQ Fernald DOE, Ohio

- b. The analytical methods that will be used.

15. Appendix A/112, Table 6-1:

- a. Delete the use of composite soil sample for the analysis of volatile organic compounds.
- b. Delete the 40 days extraction holding time for the volatile organic compounds.
- c. Correct note number four to reflect, no mixing should be allowed for samples collected for the volatile organic analysis.

16. Appendix A/124-6, the proposed deleting of Table C-1 should be replaced by the specific PSP DQOs.

17. Appendix K/66, the addition of the new procedures should be submitted in the specific PSP with the use limitations. These procedures will be evaluated in term of the specific PSP DQOs and the decision need to be made.

18. Missing pages:

- a. Appendix C missing pages 7 and 8.
- b. Appendix F missing page 11.
- c. Appendix G missing pages 43 to 74.

19. Appendix K/72, the procedure described for the analyses of volatile organic compounds in Asphalt is not acceptable. The use of rotary drill (or hammer and chisel) will cause the volatile organic compound to be lost. We recommend different procedure. A new procedure should be used. The new procedure may include cooling while grinding in a close loop.

20. Solid Sample preparation for VOC:

Caution should be exercise when solid sample are prepared for the analysis of volatile organic compounds. The process of preparation should not be done in open atmosphere and/or at room temperature. This is applicable to all the solid samples.