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

04/01/94

USEPA/DOE-FN

6

COMMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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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: Revised Site-Wide Quality Assurance Project Plan

Dear Mr. Craig:

On January 14, 1994, the United States Environmental Protection Agency (U.S. EPA) conditionally approved the United States Department of Energy's (U.S. DOE) revised Site-Wide Quality Assurance Project Plan (SCQ). The revised SCQ reflected changes made as a result of the Fernald Environmental Management Corporation becoming the new restoration management contractor. On February 1, 1994, U.S. DOE sent comment responses by facsimile, and on February 24, 1994, U.S. DOE sent formal comment responses to U.S. EPA.

U.S. EPA's conditional approval clearly specified the conditions and provided recommendations on how to satisfy the conditions of the approval. U.S. DOE's responses indicated agreement with several of U.S. EPA's comments, but failed to change the SCQ.

Therefore, U.S. DOE must incorporate U.S. EPA's required changes into the SCQ within thirty (30) days receipt of this letter, and submit changed pages and comment responses to U.S. EPA. The SCQ will not be considered approved until these issues are resolved.

Please contact me at (312) 886-0992 if you have any questions.

Sincerely,

James A. Saric, Remedial Project Manager
Technical Enforcement Section #1
RCRA Enforcement Branch

Enclosure

cc: Tom Schneider, OEPA-SWDO
Pat Whitfield, U.S. DOE-HDQ
Don OFTE, FERMCO
Jim Theising, FERMCO
Paul Clay, FERMCO

QAS comments on the response for SCQ Fernald DOE, Ohio

1. Section 2.3.3/21, the proposed change needs to include that the EPA has to evaluate the radionuclides analyses which the DOE and DOE contractors are using. The analyses and their measurements will be evaluated as part of the DQOs for the specific PSP.

The Draft response is partial, we still recommend the addition of what we proposed. The reason is the performance-based methods was to be specific for the PSP and their DQOs. All that information was going to be evaluated as per each PSP specific DQOs.

2. Section 2.3.3/21, the addition of separate DQO Manual should not eliminate the specific DQOs in each PSP.

The Draft response should be inserted so that it does not appear that the DQO Manual is to replace the specific PSP DQOs.

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.

The Draft response should be inserted so that it does not appear as if the changes are done without considering the 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.

The specific options used for SW846 methods has to be related to the PSP DQOs and will be evaluated together.

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.

The Draft response should be included since you agree with our comment.

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.

The PSP DQOs are the starting point to identify which analytical methods and laboratory will be doing the work. The number of samples, the action levels, chemical compounds and their matrices has to be defined in the PSP DQOs. Accordingly the laboratory has to be identified in each PSP.

QAS comments on the response for SCQ Fernald DOE, Ohio

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.

Incorporate the Draft Response in the specific sub-section.

- 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.

The specific PSP DQOs should have measurable steps which then be easily reportable. The intention is to make it easy to report if they are satisfied or to what degree.

8. Section 3.1.5.2/5:

- a. The traceability and accountability will be very hard 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.

We do not completely agree with the Draft-Response. We like to incorporate the approach out lined in the four points above.

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

QAS comments on the response for SCQ Fernald DOE, Ohio
technique used.

- b. Calculate the error in each decision made.

We do not agree with the Draft-Response. The two points have to be incorporated in each PSP DQOs.

- 10. Section 14.5/3, specify what is the length of the "Project"? Recommend the completeness be measured for each specific PSP.

The specific PSP may have a specific completeness need. We are not suggesting you include the time for the specific PSP rather you include that you will have that specified in each 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.

We do not agree with the comments.

- 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.

We do not agree with the comments

Since you agree with the comments, changes have to be made to reflect that. The specific change should be to the a approach, i.e., the process by which the PSP will be handled. The approach should be clearly stated and our comments must be incorporated.

- 13. Appendix A/91-96, the PSP should have all the laboratories used.

We do not agree with the comments

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The laboratory that will do the work for the PSP has to consider the specific needs and be accountable for the specific PSP DOOs. Without doing so it is up in the air about what the specific procedure that will be used for the PSP and if it will achieve the PSP DOOs.

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.
- b. The analytical methods that will be used.

We do not agree with the comments

The above information has to be provided in the PSP. This has to be stated in the SCQ and implemented in the PSP.

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

- a. Delete the use of composite soil sample for the analysis of volatile organic compounds.
- b. Delate 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.

We have a problem with composite samples that will be analyzed for volatile organic compounds. Because the results will not represent what's in the sample. If a need exist then a special technique has to be followed and the limitation has to be considered. It is vital that consideration has to be given to the PSP DOOs and the decision that has to be made.

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

We do not agree with the comments

What are the specific reasons for not including the PSP DOOs.

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.

We do not agree with the comments

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The addition of new procedures have to be evaluated together with the PSP DOOs. The QAS did not approve the referenced PSP.

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.

Agree.

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.

We do not agree with the comments

The sampling is very important part of the analysis. The QAS did not approve the referenced PSP.

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.

We do not agree with the comments

How will the solid materials be analyzed? Were any volatile compounds found? This technique does not have solid scientific ground.