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**RISK ASSESSMENT COMMENTS ON CONDITIONALLY APPROVED OU 4
REMEDIAL INVESTIGATION FINAL REPORT**

04/25/94

USEPA DOE-FN
3
COMMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:

APR 25 1994

Mr. Jack R. Craig
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

HRE-8J

RE: Risk Assessment Comments on
Conditionally Approved OU 4
Remedial Investigation
Final Report

Dear Mr. Craig:

On January 6, 1994, the United States Environmental Protection Agency (U.S. EPA) conditionally approved the Operable Unit (OU) 4 Remedial Investigation (RI) Final Report. On February 7, 1994, the United States Department of Energy (U.S. DOE) submitted revisions to the RI report. U.S. EPA indicated to U.S. DOE by conference call on March 1, 1994, that the changes to the RI report were incomplete and needed to be revised. On March 18, 1994, U.S. DOE submitted another revision to the RI report.

U.S. EPA has completed its review of the latest revision. Although the majority of the changes are acceptable a few discrepancies exist. Attached are comments indicating those discrepancies.

Therefore, U.S. DOE must incorporate the changes into the document and submit changed pages 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
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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: April 21, 1994

SUBJECT: Review of Final Changes for the RI Report for Operable Unit 4, Fernald Environmental Management Project (FEMP), Fernald, OH, March 18, 1994

FROM: Pat Van Leeuwen, Toxicologist *PVL*
Technical Support Unit

TO: Jim Saric
Project Manager

I have reviewed the changes for the Final Remedial Investigation Report for Operable Unit 4 of the Fernald Environmental Management Project (FEMP). Unfortunately, there are still some errors in the document; however, they are mostly typos and mathematical errors. I would expect that these can be corrected quickly and corrected pages submitted for review so that the RI report can be finalized.

The following is a summary of the errors still remaining in the document.

If you have any questions on these comments or any section of the risk assessment, please contact me at 886-4904.

Section D.3.4.1, Page D-3-68

The editorial change is not the change provided in the prior response/action (see 10/27/93.rev7). This was the response we agreed upon, and it is more correct. I agree that there was no "final" version of the EPA uptake biokinetic model for lead available in 1992; however, there were interim versions of the model (0.50/0.60), and there is a new interim version (0.99D) now. All are appropriate for use at Superfund sites.

Table D.4-1, footnote f

The phrase "Chemical/Wilmington, Delaware)," dated October 9, 1990" is superfluous. Please remove.

Table D.7-2

The HI totals listed as "ALL MEDIA" are incorrect.

Unfortunately, this error will require corresponding changes in Tables 6.2 and 7.2, as well as text changes. This will be a difficult correction. Please check HI totals in the Section D.II Tables as well.

Page D-I-12, Example Calculation

The body surface area (SA) parameter value (0.7m²) used in the example calculation does not match the value listed for this receptor/pathway in Table D.3-12 (0.8 m²). Which was used in the risk assessment?