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RE: DOE FEMP ENVIRONMENTAL MONITORING PROGRAM
EVALUATION

11/03/94

OEPA
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LETTER

DOE-FN



State of Ohio Environmental Protection Agency

Southwest District Office

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Dayton, Ohio 45402-2086
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George V. Voinovich
Governor

November 3, 1994

RE: DOE FEMP
ENVIRONMENTAL MONITORING
PROGRAM EVALUATION

Mr. Wally Quaider
Acting Assistant Director, Office of Safety, Operations & Technical Support
DOE FEMP
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Quaider:

Consistent with the State of Ohio/DOE Agreement In Principle, Ohio is initiating its evaluation of the Environmental Monitoring Program (EMP) at the Fernald Environmental Management Project (FEMP). In order to effectively evaluate the program, Ohio EPA has attempted to compile DOE's stated objectives for the EMP. We will employ these objectives in our evaluation of the program. The list of objectives we have defined is attached (see Attachment I). Ohio EPA would appreciate your review of these objectives to ensure they are consistent with DOE's understanding of the objectives. We would welcome any clarifications regarding the objectives you could provide.

Ohio will use these objectives to evaluate the EMP. Ohio will attempt to determine whether the program implemented at FEMP is designed around these objectives and how well it attains them. An outline has been developed to provide direction to our evaluation. A draft outline is attached (see Attachment II). We welcome any comments you may have concerning our proposed process for conducting the evaluation.

Should you have any questions or comments regarding our program, feel free to contact me (285-6466) or Donna Bohannon (285-6453).

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

Attachments

cc: w/enc Bob Owen, ODH
Jack Craig, DOE/FEMP

Sue Smiley, DOE/OFO
Pat Kraps, FERMC0

ATTACHMENT I

OBJECTIVES OF THE FEMP ENVIRONMENTAL MONITORING PROGRAM* ¹

1. The EMP shall be capable of verifying and/or determining compliance with applicable environmental statutes, regulations, and standards.
2. Monitoring activities shall provide the data necessary to characterize releases, determine performance of equipment, establish trends, support environmental management decisions, and demonstrate compliance with legal and regulatory requirements set forth in applicable environmental statutes, regulations, and standards.
3. The Environmental Monitoring Program shall also be capable of detecting and quantifying unplanned releases.

OBJECTIVES OF THE ENVIRONMENTAL SURVEILLANCE (ES) PROGRAM*

1. Confirm predictions of public dose based on effluent models.
2. Characterize conditions of offsite environs.
3. Provide data for dose estimates to the public where appropriate.
4. Provide data for spacial and temporal analyses.
5. Provide data for the ASER.
6. Provide data to demonstrate compliance with applicable federal, state, and local regulations.
7. Provide data in areas of public interest.

OBJECTIVES OF ES SAMPLING DESIGN*

The ES program shall be designed to include the ability to assess the following;

1. Potential for release of hazardous materials.
2. Extent to which facility operations are routine and unchanging.
3. Need for supplementing effluent monitoring.
4. The size and distribution of the exposed population.
5. The cost effectiveness of the environmental surveillance program.
6. The availability of measurement techniques that provide sufficiently sensitive comparisons with the applicable standard and background measurements.

* - drawn from the FEMP EMP dated 5/31/93, pgs. 1-6, 5-1, & 5-14.

¹ - includes effluent and surveillance monitoring

ATTACHMENT II

OUTLINE FOR EVALUATING THE FERNALD ENVIRONMENTAL MONITORING PROGRAM

I. GROUNDWATER

- a. Evaluate FEMP's choice of sampling locations with regard to program objectives and available site data (OU5 RI).
- b. Evaluate FEMP's choice of parameters with regard to program objectives and available site data (OU5 RI).
- c. Evaluate FEMP's choice of analytical methods with regard to program objectives and approved methodology.
- d. Evaluate FEMP's choice of field procedures (SOPs) with regard to program objectives and approved procedures.
- e. Evaluate FEMP's analysis and interpretation of data in the 1993 Environmental Monitoring Report.

II. SURFACE WATER

- a. Evaluate FEMP's choice of sampling locations with regard to program objectives and available site data (OU5 RI).
- b. Evaluate FEMP's choice of parameters with regard to program objectives and available site data (OU5 RI).
- c. Evaluate FEMP's choice of analytical methods with regard to program objectives and approved methodology.
- d. Evaluate FEMP's choice of field procedures (SOPs) with regard to program objectives and approved procedures.
- e. Evaluate FEMP's analysis and interpretation of data in the 1993 Environmental Monitoring Report.

III. SEDIMENT

- a. Evaluate FEMP's choice of sampling locations with regard to program objectives and available site data (OU5 RI).
- b. Evaluate FEMP's choice of parameters with regard to program objectives and available site data (OU5 RI).
- c. Evaluate FEMP's choice of analytical methods with regard to program objectives and approved methodology.
- d. Evaluate FEMP's choice of field procedures (SOPs) with regard to program objectives and approved procedures.
- e. Evaluate FEMP's analysis and interpretation of data in the 1993 Environmental Monitoring Report.

IV. SOIL

- a. Evaluate FEMP's choice of sampling locations with regard to program objectives and available site data (OU5 RI).
- b. Evaluate FEMP's choice of parameters with regard to program objectives and available site data (OU5 RI).
- c. Evaluate FEMP's choice of analytical methods with regard to program objectives and approved methodology.
- d. Evaluate FEMP's choice of field procedures (SOPs) with regard to program objectives and approved procedures.
- e. Evaluate FEMP's analysis and interpretation of data in the 1993 Environmental Monitoring Report.

V. AIR

- a. Evaluate FEMP's choice of sampling locations with regard to program objectives and available site data (OU5 RI).
- b. Evaluate FEMP's choice of parameters with regard to program objectives and available site data (OU5 RI).
- c. Evaluate FEMP's choice of analytical methods with regard to program objectives and approved methodology.
- d. Evaluate FEMP's choice of field procedures (SOPs) with regard to program objectives and approved procedures.
- e. Evaluate FEMP's analysis and interpretation of data in the 1993 Environmental Monitoring Report.

VI. VEGETATION (Grass)

- a. Evaluate FEMP's choice of sampling locations with regard to program objectives and available site data (OU5 RI).
- b. Evaluate FEMP's choice of parameters with regard to program objectives and available site data (OU5 RI).
- c. Evaluate FEMP's choice of analytical methods with regard to program objectives and approved methodology.
- d. Evaluate FEMP's choice of field procedures (SOPs) with regard to program objectives and approved procedures.
- e. Evaluate FEMP's analysis and interpretation of data in the 1993 Environmental Monitoring Report.

VII. FOODSTUFFS (Milk, Fish, Produce)

- a. Evaluate FEMP's choice of sampling locations with regard to program objectives and available site data (OU5 RI).
- b. Evaluate FEMP's choice of parameters with regard to program objectives and available site data (OU5 RI).
- c. Evaluate FEMP's choice of analytical methods with regard to program objectives and approved methodology.
- d. Evaluate FEMP's choice of field procedures (SOPs) with regard to program objectives and approved procedures.
- e. Evaluate FEMP's analysis and interpretation of data in the 1993 Environmental Monitoring Report.

VIII. PUBLIC CONCERNS

- a. Evaluate public concerns with current program and how the program might be changed to address those concerns.
- b. How the public might want Ohio EPA to develop our program to meet their concerns.