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AREA 1, PHASE 1, PSP

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

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REPLY TO THE ATTENTION OF:

JAN 16 1997

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

SRF-5J

RE: Area 1, Phase 1, PSP

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Area 1, Phase 1 procedures and Project Specific Plan (PSP) for precertification and certification of Operable Unit 5 soils.

This document presents procedures and PSPs for soil precertification and certification.

Overall the PSPs and procedures provided in the document are too generic and vague, and require more detail and revision.

Therefore, U.S. EPA disapproves the PSP pending incorporation of adequate responses to the attached comments into the document. U.S. DOE must submit responses to comments and a revised PSP document within thirty (30) day receipt of this letter.

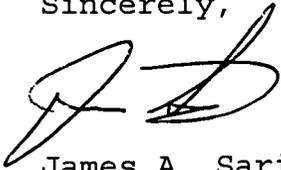
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Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,



James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Jack Baublitz, U.S. DOE-HDQ
John Bradburne, FERMCO
Charles Little, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

TECHNICAL REVIEW COMMENTS ON
"AREA 1, PHASE I PROCEDURES AND PROJECT SPECIFIC PLANS
FOR PRECERTIFICATION AND CERTIFICATION
FOR OPERABLE UNIT 5 SOILS"
FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENTS

Commenting Organization: U.S. EPA
Section #: Not applicable (NA) Page #: NA
Original General Comment #: 1.

Commentor: Saric
Paragraph #: NA

Comment: The project specific plans (PSP) and procedures are too generic and vague. Detailed information on decision processes that will be in place during certification and comparability sampling is not included in the plans. Throughout the PSPs, the text states that decisions will be made by the project lead. The text should be revised where appropriate to provide the basis for these decisions to be made by the project lead. The general comments below discuss the PSPs for certification sampling and the comparability study, Part B.

Project-Specific Plan for Certification Sampling

Commenting Organization: U.S. EPA
Section #: NA Page #: NA
Original General Comment #: 2.

Commentor: Saric
Paragraph #: NA

Comment: The text states that sampling and analysis for waste acceptance criteria (WAC) attainment will be completed only for total uranium. Total uranium is not the only constituent of concern (COC) in Area 1. The text should be modified to state that sampling and analysis will be limited to total uranium because this COC is the only COC present at levels above the WAC.

Commenting Organization: U.S. EPA
Section #: Appendixes C,D, and H Page #: NA
Original General Comment #: 3.

Commentor: Saric
Paragraph #: NA

Comment: These appendixes list selected subunits and coordinates for sampling and analysis but do not show how these subunits and coordinates were defined. The selections appear random. If the "random number" function included in virtually all computers and many calculators was used, these numbers are pseudo-random and not random (Press and others 1992). Unless the generating function is properly initialized (perhaps for each certification unit) and unless the "random number" function runs for a sufficient period, the selections will become sequentially coordinated and will not be sufficiently random for the purposes of sampling the entire subunit (Schneier 1996). The text of the appendixes

References

- McCormac, Jack C. 1991. *Surveying Fundamentals*. Second Edition. Prentice Hall. Englewood Cliffs, New Jersey.
- Natrella, Mary Gibbons. 1963. *Experimental Statistics*. National Bureau of Standards Handbook 91. Government Printing Office. Washington, D.C. Page 3-4.
- Press, William H., and others. 1992. *Numerical Recipes in FORTRAN, The Art of Scientific Computing*. Second Edition. Cambridge University Press. New York, New York.
- Schneier, Bruce. 1996. *Applied Cryptography*. Second Edition. John Wiley & Sons, Inc. New York, New York.