



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

REPLY TO THE ATTENTION OF

APR 01 1998

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

SRF-5J

RE: U.S. EPA Revised
SCQ Comments

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) Responses to Comments (RTC) for revision 1.0 of the Sitewide Comprehensive Environmental Response, Compensation, and Liability Act Quality Assurance Project Plan (SCQ).

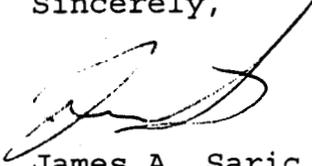
U.S. DOE's RTC and cross reference table addressed the majority of U.S. EPA's previous comments. However, there remain a few comments that require clarification or revision.

Therefore, U.S. EPA disapproves the RTC for the SCQ pending receipt of adequate responses and their incorporation into a revised document. U.S. DOE must submit responses to comments and a revised SCQ within thirty (30) days receipt of this letter.

REC'D
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L-01132
6446.158

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
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

MEMORANDUM

SRT-4J

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DATE: March 25, 1998

SUBJECT: Review of the responses to FSS comments on the Sitewide CERCLA QAPP (Revision 1) for Fernald Environmental Management Project , Fernald , OH.

FROM: L. Finkelberg, Chemist
Field Services Section

TO: J. Saric, RPM

CC : Steve Ostrodka, Chief FSS

I have reviewed the responses submitted by U.S. Department of Energy Fernald Area Office to FSS comments for Revision 1 Sitewide CERCLA QAPP for Fernald Environmental Management Project, Fernald, OH .

Attached are my comments on the QAPP which require further revision.

U.S. EPA Original Comment I.

The signature page with the title and date of approval should be included for individuals who have reviewed and approved the document (including the US EPA Region 5 RPM, US EPA Region 5, QA Reviewer, Contractor Project Manager, Contractor Sampling Organization, Responsible Laboratory(is), Contractor QA Manager). The titles and names of all individuals appearing on the title page should be consistent with the references to those people elsewhere in the QAPP.

Page 54 is missing from the submitted document . I assume, that the response to this comment is part of the missing page; therefore, the comment is not addressed.

U.S. EPA Original Comment 4.

Section 4.1.2 needs to outline that matrix spike /matrix spike duplicate samples are investigative samples; aqueous MS/MSD samples must be collected at triple the volume for VOCs and double the volume for extractable organics. The soil MS/MSD samples require no extra volume for VOCs or extractable organics.

The comment is not adequately addressed. Section K.5.4.E.1 should be revised to specify that the soil MS/MSD samples require no extra volume for VOCs or extractable organics.

U.S. EPA Original Comment VII.

1. Section 7.1.3 needs to provide the example of numbering system that is going to be generated by LIMS.

The example of numbering system should specify how the Field QC samples will be identified. How a nine-digit number will identify different sample matrix, the location code, etc.?

TECHNICAL REVIEW OF RESPONSES TO U.S. EPA COMMENTS ON
"SITEWIDE CERCLA QUALITY ASSURANCE PROJECT PLAN"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Not Applicable (NA) Page #: NA Line #: NA
DOE Response #: 4 Original General Comment #: 4

Comment: The original general comment requests that the "Sitewide CERCLA Quality Assurance Project Plan" (SCQ) include a discussion of sampling procedures for both radiological air particulate monitoring and direct radiation monitoring. The U.S. Department of Energy's (DOE) response to this comment is generally acceptable. However, the response does not indicate that Section 6.4.5 of the SCQ will be revised to specifically address the high-volume air samples that will be collected to demonstrate compliance with National Emission Standards for Hazardous Air Pollutants, Subpart H. Section 6.4.5 should be revised to incorporate the information presented in the first two paragraphs of new Section K.6.5.1.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: NA Line #: NA
DOE Response #: 5 Original General Comment #: 5

Comment: The original general comment requests clarification of the quality assurance and quality control (QA/QC) requirements for gaseous matrix samples. The response to this comment and the proposed revisions to the SCQ are acceptable with the following three exceptions.

First, the response includes revised text ("Specific requirements and guidelines are stated in Appendix K.6.2.4.") that is to be inserted on SCQ Page 6-11, Line 17. The revised text should be inserted on Line 27 of Page 6-11 instead.

Second, Item B.1 of revised Section K.6.2.4 in the response states that the 95 percent upper confidence limit of spiked data for radon alpha track-etch detectors divided by the mean of that data will be used as the test statistic for overall precision. Item B.2 of revised Section K.6.2.4 then provides equations for detailed precision checks using the standard deviation of the spiked data divided by the mean as the test statistic. The SCQ should be revised either to clarify the fact that two different test statistics are to be used as precision criteria or to correct the erroneous text if only one statistic is to be used.

Third, DOE's response includes new material on alpha track-etch detectors to be inserted in Table G-2 as "Criterion: 59." The final entry in Table G-2 is currently Criterion 59, so the new material on alpha track-etch

tables. Therefore, the information on particulate matter should probably be added to Tables G-1 and G-2 as Criterion 61.