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

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Mr. Johnny W. Reising
United States Department of Energy
Fernald Area Office
P.O. Box 398705
Cincinnati, Ohio 45239-8705

REPLY TO THE ATTENTION OF: SRF-5J

Subject: Conditional Approval of Revised "Project Specific Plan for HPGe Confirmatory Measurement at the In-Site Disposal

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the above-referenced document as part of its oversight activities for the Fernald Environmental Management Project (FEMP). The document provides procedures for confirming that no residual total uranium concentrations exceeding waste acceptance criteria will remain in the On-site Disposal Facility (OSDF) following excavation of visible process residue from soil and soil-like material placed in the OSDF.

U.S. EPA found that the document is acceptable with two exceptions. First, in Section 2.1 on Page 2-1, the text states that the waste acceptance organization manager will notify the Ohio Environmental Protection Agency when visible process residue is discovered in the OSDF. The text should be revised to state that the U.S. EPA will also be notified when visible process residue is discovered in the OSDF.

Second, in Section 2.2 on Page 2-1, the text presents procedures for collecting high-purity germanium (HPGE) detector data and states criteria for conducting either additional excavation or additional HPGe detector measurements. The text should also state that an HPGe detector result of 300 parts per millions of uranium, which is well within the criteria stated in the text, could reflect either acceptable surface concentrations of uranium or unacceptable subsurface concentrations. Previous discovery of process material in the OSDF suggests that such subsurface concentrations are a distinct possibility. Therefore, the project specific plan should be revised to state that validation of HPGe detector results will include comparison of the relative strengths of high- and low-energy peaks to determine whether buried process residue or other high-concentration material is present.

U.S. EPA conditionally approves this document pending incorporation of the above-mentioned comments. Please contact me at (312) 886-4591 if you have any questions.

Sincerely,

Gene Jablonowski
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

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cc: Tom Schneider, OEPA-SWDO
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO