



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
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CHICAGO, IL 60604-3590

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LOG D-1237

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REPLY TO THE ATTENTION OF:

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**JUL 24 2003**

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

SRF-6J

RE: SCQ Document Change  
Requests 2

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) May 28, 2003, Document Change Requests (DCR) to the Sitewide Comprehensive Environmental Response, Compensation, and Liability Act Quality Assurance Project Plan (SCQ), previously finalized on July 28, 1998.

Although the majority of the DCRs to the SCQ are minor and appear adequate, U.S. EPA has attached comments on the DCRs that must be addressed. Therefore, U.S. EPA disapproves the DCRs to the SCQ. U.S. DOE must submit responses to U.S. EPA comments, incorporate the DCRs into the SCQ and submit a revised SCQ to U.S. EPA within thirty (30) days receipt of this letter.

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  
Sally Robison, U.S. DOE-HDQ  
Jamie Jameson, Fluor Fernald  
Terry Hagen, Fluor Fernald  
Tim Poff, Fluor Fernald



Method 5035 for collection of soil samples for VOC analysis. The table should be revised to reflect this requirement.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: DCR 2002-021 Page #: NA Line #: NA  
Original Specific Comment #: 2

Comment: The text of this DCR updates Table G-1, which lists acceptable analytical methods. Analysis for methylene blue active substances (surfactants) is included in the DCR, but this analysis is deleted from Table 6-1 by DCR 2002-020. The DCRs and tables should be made internally consistent in this respect.

DCR 2002-021 identifies the reduction/oxidation potential analytical method as "ASTM-1498," which is ambiguous because the American Society of Testing and Materials has seven series for specifications and methods that are differentiated by letter designations. The citation should be revised to "ASTM D 1498" so that it is not confused with ASTM C 1498; E 1498; or F 1498.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: DCR 2002-029 Page #: NA Line #: NA  
Original Specific Comment #: 3

Comment: This DCR states that a revised Appendix D.2 is attached, but only one page with no attachments is included in this DCR. The revised appendix should be provided for review.

Section D.2.3 in the April 2003 SCQ lists current data validation guidance, including U.S. EPA's guidance documents for validation of organic and inorganic data. In August 2002, U.S. EPA issued a similar guidance document for validation of data for chlorinated dioxins, and furans which are listed as "dioxins" in Table G-1. This guidance document is available at <http://www.epa.gov/superfund/programs/clp/guidance.htm>. This SCQ's guidance document should be identified here and in the SCQ's reference section, which is revised in DCR 2002-030.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: DCR 2002-031 Page #: NA Lines #: NA  
Original Specific Comment #: 4

Comment: In this DCR, the revisions of Sections 10.2 and 10.3 cite Table G-2 for inorganic and organic analytical methods, while the revised Section 10.4 cites Table G-3 for

radiometric quality control requirements. However, in the April 2003 SCQ, Table G-1 lists analytical methods, Table G-2 lists quality requirements for certain radiometric procedures, and Table G-3 lists highest allowable minimum detectable concentrations for some radioisotopes. Unless the SCQ tables involved are to be renumbered, the table citations identified above should be revised for accuracy.