



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590
FERNALD
E-0307

DEC 24 2003

DEC 30 A 11:17

6446-6C17
REPLY TO THE ATTENTION OF:

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

SRF-6J

RE: Paddys Run and Drainage 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) Project Specific Plan (PSP) for the predesign characterization of sediments in Paddys Run and associated drainage features. This PSP provides the details of predesign sampling and nonintrusive characterization activities for characterizing the soil and sediment in Paddys Run, the Storm Sewer Outfall Ditch, and the Pilot Plan Drainage ditch.

Although the PSP appears conceptually adequate, U.S. EPA has several comments on the document. Therefore, U.S. EPA disapproves the PSP for the predesign characterization of sediments in Paddys Run and associated drainage features. U.S. DOE must submit responses to comments and a revised document 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

TECHNICAL REVIEW COMMENTS ON
"PROJECT SPECIFIC PLAN FOR PREDESIGN CHARACTERIZATION OF
SEDIMENTS IN PADDYS RUN AND ASSOCIATED DRAINAGE FEATURES"

FERNALD CLOSURE PROJECT

GENERAL COMMENT

Commenting Organization: U.S. EPA Commentor: Saric

Section #: Not Applicable (NA) Page #: NA Line #: NA

Original General Comment #: 1

Comment: The plan indicates that sediment samples will be collected from 0 to 0.5 foot depth intervals but also indicates that deeper core samples could be collected if deeper sediment deposits are encountered. However, the plan does not provide criteria or procedures for collecting samples deeper than the 0 to 0.5 foot interval. The text should be revised to provide these criteria and procedures. Moreover, the criteria and procedures should be developed and applied for the transect sampling, entry channel sampling, debris location sampling, and biased sampling activities.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric

Section #: 2.5.2.1 Page #: 2-7 Lines #: 1 and 2

Original Specific Comment #: 1

Comment: The text states that the depth interval for sediment samples will be 0 to 0.5 foot but that in some cases deeper core samples will be required. The text should be revised to provide the criteria and procedures for collecting sediment samples deeper than the 0 to 0.5 foot interval. Also, in the event that multiple 6-inch core samples are collected at one sampling location, the text should be revised to clarify whether all the core samples will be analyzed for all the area-specific constituents of concern.

Commenting Organization: U.S. EPA Commentor: Saric

Section #: 2.5.2.1 Page #: 2-7 Lines #: 5 and 6

Original Specific Comment #: 2

Comment: The text states that sampling activities will be suspended if anomalous materials or possible fill areas are discovered. The text should be revised to provide a contingency plan for delineating the depth and areal extent of any fill areas discovered during sampling activities.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.0 Page #: 3-1 Line #: 10

Original Specific Comment #: 3

Comment: The text states that all borings will be completed to a depth of 6 inches. However, other sections of the plan state that sediment samples may be collected from deeper intervals. As stated in General Comment 1, the text should be revised to provide the criteria and procedures for collecting sediment samples deeper than the 0 to 0.5 foot interval.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 4.1 Page #: 4-1 Lines #: 9 and 10

Original Specific Comment #: 4

Comment: The text states that one trip blank will be collected each day that samples for volatile organic compound (VOC) analysis are collected or that one trip blank will be collected for each 20 samples collected for VOC analysis, whichever is more frequent. The text should be revised to state that one trip blank will be collected and shipped in each cooler containing samples for VOC analysis.