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February 6, 2009

Ms Jane Powell
Fernald Preserve Manager
DOE-LM-20.1
10995 Hamilton Cleves Hwy
Harrison, Ohio 45030

RE: COMMENTS – FERNALD PRESERVE QUALITY ASSURANCE PROJECT PLAN

Ms Powell:

Ohio EPA has received DOE's "Transmittal of Fernald Preserve Quality Project Plan" on December 19, 2008. Ohio EPA has reviewed the plan and our comments are enclosed.

If there are any questions, please contact me.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

Cc: Tim Fischer, US EPA
Michelle Cullerton, Tetra Tech
Frank Johnston, Stoller

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**OHIO EPA COMMENTS ON THE FERNALD PRESERVE
QUALITY ASSURANCE PROJECT PLAN**

General Comment:

1. Commenting Organization: Ohio EPA

Section #: na Pg #: na Line #: na Code: C

Comment: The document appears to be inconsistent with the level of detail for different aspects of the QAPP. Some sections only receive a "high-level" summary while other sections add detail that may be more appropriately incorporated into a procedure.

Comments:

2. Commenting Organization: Ohio EPA

Section: 1.0/Figure 1-1 Pg#: 1-1 Line#: Code: E

Comment: Please spell out the acronym "LMS" on the Organizational chart or record it on the Acronym list.

3. Commenting Organization: Ohio EPA

Section #: 2.1.2 Pg #: 2-4 Line #: na Code: C

Comment: Change the last sentence in the last paragraph from, "It is also suspected that air emissions contributed to both on-site and off-site deposition of soils," to, "Also, air emissions contributed to both on-site and off-site deposition of soils." [emphasis added] It is a fact that air emissions contaminated surface soils both on and off site.

4. Commenting Organization: Ohio EPA

Section #: 2.1.3 Pg #: 2-5 Line #: na Code: C

Comment: The sentence, "Soil certification processes were performed to ensure that excavation had removed all impacted material," is not accurate. Change the wording to reflect that soil certification was performed to ensure that excavation had removed all *detected materials above FRLs*.

5. Commenting Organization: Ohio EPA

Section #: 2.1.4 Pg #: 2-6 Line #: na Code: C

Comment: The statement, "All contaminated soils have been excavated..." is not accurate. Change the wording to reflect that all soils detected above FRLs have been excavated.

6. Commenting Organization: Ohio EPA

Section: 3.2.1 Pg#: 3-2 Line#: 2nd Para/fourth bullet Code: C

Comment: The fourth bullet is a critical project point for cleanup levels and groundwater remediation, the remaining uncertified soils and closing of the OU5 area. These specifics need to be mentioned here or provide a reference where they are discussed in the document or other documents. In addition, any sampling done now ensures the protection of the remedy. This point seems to be left out of the document and needs to be made clear here, as well as throughout.

7. Commenting Organization: Ohio EPA

Section #: 3.3.1 Pg #: 3-3 Line #: na Code: C

Comment: A bullet should be added to this section that adds an objective for data use that includes compliance with NESHAP Subpart H requirements.

8. Commenting Organization: Ohio EPA

Section: 3.3.2 Pg#: 3-4 Line#: last Para/last line Code: C

Comment: Please write out the title of the annual report in the last sentence. The above text refers to other documents which are tied to the Quapp. Referencing the SER completes the information.

9. Commenting Organization: Ohio EPA

Section: 3.3.4 Pg#: 3-9 Line#: third Para Code: C

Comment: What are the "seven guiding safety management principles" and the "five core ISMS functions?" In addition, where are they discussed within the document? Please clarify the text.

10. Commenting Organization: Ohio EPA

Section: 3.3.7 Pg#: 3-10 Line#: Code: C

Comment: Before post closure of the site, variances were handled somewhat differently. However, the text does not specifically say whether the variances will follow the same protocol regarding "significant and non-significant" or whether there will be just one type of variance. Please clarify. Lastly, will variances be reviewed by the Agencies?

11. Commenting Organization: Ohio EPA

Section #: 8.0 (Table 8-1) Pg #: 8-2 to 8-6 Line #: na Code: C

Comment: It appears that detail provided in Table 8-1 exceeds the detail that is appropriate for a Quality Assurance Project Plan. This type of detail may be more appropriate in a sampling procedure. Listing media and method would seem to be the appropriate level of detail for this table.

12. Commenting Organization: Ohio EPA

Section #: 8.0 (Table 8-1) Pg #: 8-6 Line #: na Code: E

Comment: The units for the radionuclide air particulates are incorrect. Each of the radionuclides has liters (L) in the denominator. These samples are typically reported as pCi/sample from the laboratory. Air concentrations are then reported in units of pCi/m³ after the flow rates through each filter are evaluated. The same is true for total uranium except the sample is reported as µg instead of pCi.

13. Commenting Organization: Ohio EPA

Section #: 8.5.1 Pg #: 8-7 Line #: na Code: E

Comment: A couple of the parameters of precision, RPD and RER, should be spelled out before the acronyms are used.

14. Commenting Organization: Ohio EPA

Section #: 8.5.2 Pg #: 8-7 Line #: na Code: E

Comment: The acronyms LCS and MS should be spelled out before they are used in the text.

15. Commenting Organization: Ohio EPA

Section #: 8.5.4 Pg #: 8-8 Line #: na Code: E

Comment: The acronyms MDL and MDC should be spelled out before they are used in the text.

16. Commenting Organization: Ohio EPA

Section #: 13.1.1 Pg #: 13-1 Line #: na Code: C

Comment: The text states, "All calculations and results, including field measurements, shall be independently reviewed." This statement does not define what "review" means, nor do the referenced Sections 5.2 and 6.2. Are the calculations reviewed for completeness or accuracy? What are the qualifications of the reviewer?

17. Commenting Organization: Ohio EPA

Section #: 13.5 Pg #: 13-6 Line #: na Code: E

Comment: Add the word, "uses," to the last sentence of the first paragraph of this section.