



PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION:

WASTE AREA GROUP 10, OPERABLE UNIT 10-08 — REMEDIAL INVESTIGATION/FEASIBILITY STUDY WORK PLAN (DRAFT FINAL)

DATE: July 30, 2002

REVIEWER: IDEQ

ITEM NUMBER	PAGE NUMBER	PARAGRAPH	COMMENT	RESOLUTION
GENERAL				
1.	xiv	Acronyms	The acronym "PWTF" is not defined in this list. It is suspected this acronym should be NPTF for the New Pump and Treat Facility for contaminated ground water at Test Area North (TAN). Please correct as needed.	Comment accepted. The acronym "PWTF" which stands for the "Portable Water Treatment Facilities" will be added to the list. The full term and acronym will also be added to Appendix A, Section A-3.1, Page A-8 as identified in Comment #40.
2.	1-1	Section 1 Paragraph 2	The "2012 Plan" is still draft and details have not been completely resolved between the agencies. The language in this paragraph should reflect more clearly the status of the "2012 Plan". Please revise the text. The last sentence of this paragraph is incomplete. Please revise the sentence to clarify the intent, as it is not clear as stated.	Comment accepted. The section will be revised to reflect the status of the "2012 Plan" as it relates to the OU 10-08 Work Plan. Comment accepted: The sentence will be revised to clarify the intent.
3.	Ibid	Bullet 2 Paragraph 6	This bullet would be clearer if it states that the individual WAGs will remediate ground water plumes attributed to that WAG and that WAG 10 will evaluate the potential overlap of the plumes for cumulative risk assessment and comparison to MCLs where appropriate.	Comment accepted: The section will be revised to include the evaluation of cumulative risk from identified commingled plumes.
4.	Ibid 1-2	1	This paragraph incorrectly leads the reader to believe that WAG 10 is primarily, if not solely, concerned about the down gradient boundary and "perimeter groundwater conditions". The paragraph should be clarified to note that WAG 10 also is concerned about ground water conditions within the boundary of the INEEL and that interior ground water conditions are of paramount concern to the CERCLA action.	Comment accepted: This paragraph will be revised to indicate that WAG 10 will be concerned with groundwater compliance everywhere beneath the INEEL and also downgradient offsite if necessary.

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5.	Ibid	Bullet 8 Paragraph 4	The bullet should be expanded to include those COPCs that are identified as COCs by the RODs for the individual WAGs. The bullet as stated implies that only sampling data will be used to develop a COPC list for this Operable Unit (OU).	Comment accepted: This bullet will be expanded to identify that the source of the COPC list for WAG 10 OU10-08.
6.	Ibid	Bullet 9	It is suggested that the paper trail to closeout new sites post ROD and to document the actions taken on the new sites may best be accomplished by an Explanation of Significant Difference (ESD). ESDs could be developed after each 5-year review as needed.	Comment partially accepted: The bullet will be revised to indicate that an ESD will be one of the mechanisms considered to address the close out of new sites post ROD.
7.	1-3	Section 1.1.2 Paragraph 3	The last sentence should more clearly state the goal to address new sites that are identified "post OU 10-08 ROD". As stated, it appears the ROD must identify these new sites to be addressed in a post ROD evaluation and possible action that is not the intent.	Comment accepted: This sentence will be revised to clarify the statement.
8.	2-1	Section 2.1.1 Bullet 3	It is not clear why this bullet restricts new site considerations to only "surface soil sites". Although unlikely, this bullet should be broader in scope to accommodate any new site regardless of the medium involved. Please rephrase this bullet to encompass all media that might be identified as contaminated post ROD.	Comment accepted: The bullet will be revised to clarify the bullet.
9.	2-6	Section 2.5.4.1	Please delete "of" from the second sentence.	Comment accepted: The wording will be corrected as recommended.
10.	2-6	Section 2.5.4.2	The intent of the last sentence is not clear; please revise.	Comment accepted: The wording of this section will be revised to clarify it.
11.	2-8	Section 2.6.8	Past tri-party agreements for proposed actions has not included the use of "waivers". Although an option under CERCLA, waivers have not been viewed with favor by the agencies. It is suggested that the reference to proposed waivers be deleted from the document.	Comment not accepted: While it is agreed that in the past the proposed actions have not included the use of "waivers", it needs to remain as one of the possibilities for future proposed actions.

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12.	2-9	Section 2.7	<p>The fourth sentence would be better stated to refer to EPA guidance (EPA, 1988) as noted in a later paragraph.</p> <p>The last two sentences should refer to the Idaho Department of Environmental Quality (IDEQ) and not the Idaho Department of Health and Welfare (IDHW).</p>	<p>Comment accepted: The sentence will be revised as suggested.</p> <p>Comment accepted: The references to the Idaho Department of Environmental Quality (IDEQ) will be corrected as recommended.</p>
13.	3-3	Section 3.2.1 Paragraph 1	<p>The paragraph should be expanded to state the EPA and IDEQ will be consulted should budget dictate consideration of a change in agreed to scope. Such decisions should not be made unilaterally.</p>	<p>Comment accepted: The paragraph will be expanded to state the EPA and IDEQ will be consulted should budget dictate consideration of a change in agreed to scope.</p>
14.	4-11	Section 4.2.5 Figure 4-8	<p>The symbolism used to display the "MAJOR INTERBED" is the same as the symbolism used for "TERTIARY RHYOLITE" and is virtually impossible to discern on the figure from "QUATERNARY RHYOLITE". Please select different symbols to represent these units on this figure.</p>	<p>Comment accepted: The symbols in the figure will be revised better display and discern the information on the figure.</p>
15.	4-18	Section 4.2.8 Figure 4-11	<p>The symbolism used to differentiate between "Eolian Deposits" and "Lacustrine Deposits" appears to be the same. Please use a different color or symbol for one of the two units noted.</p>	<p>Comment accepted: The symbols in the figure will be revised better display and discern the information on the figure.</p>
16.	4-26	Section 4.3.1 Paragraph 3	<p>Please delete the second "between" in the second sentence to clarify the intent of the sentence.</p>	<p>Comment accepted: The sentence will be revised as suggested.</p>
17.	4-31	Section 4.3.4 Paragraph 3	<p>The paragraph states "The perched water is over 20 m (60 ft) thick in places and extends laterally over 1000 m in a southwest direction, counter to the prevalent groundwater flow direction." Since the regional ground water flow direction in the vicinity of TRA is to the south or southwest, it is not clear how this can be construed as being "counter to the prevalent groundwater flow direction." Please modify this statement as needed.</p>	<p>Comment accepted: The paragraph will be modified as suggested.</p>

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18.	4-45	Section 4.6 Paragraph 4	The fourth sentence should refer to "ecologically sensitive" areas, not area, unless the intent is to refer to the whole of the INEEL as an ecologically sensitive area. Please clarify as needed.
19.	4-47	Section 4.7.2 Paragraph 2	Please clarify the area(s) available for grazing in the next to last sentence. As stated, it is not clear if there are two separate areas of 121,410 ha and 141,645 ha or if the area used for grazing ranges from 121,410 ha to 141,645 ha.
20.	4-49	Section 4.8 Paragraph 1	The first sentence contains a typographical error "trip arty". Please correct.
21.	4-50	Section 4.9.2 Paragraph 2	The fourth sentence states "OU 10-08 will monitor residual groundwater contamination levels downgradient at the INEEL boarders." The thought should be expanded to note OU 10-08 also will monitor ground water contamination levels within the INEEL as a primary objective while contamination levels at the borders is a secondary objective. Also, it is suggested that "downgradient" be spelled as two words and the term 'border' be used instead of "boarders".
22.	Ibid		The last sentence can be clarified by replacing the second "to" with the word 'the'.
23	5-7	Section 5.3.1 Paragraph 2	Please clarify the wording of the first sentence to note how this information relates to Phase C of the ROD for TSF-05. It is not clear as stated.

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24.	5-13	Section 5.3.7 Paragraph 1	The logic presented in the first two sentences is not correct and, unfortunately, was not caught in the draft. With an assumption of conservation of mass, a flatter hydraulic gradient will be coincident with a higher transmissivity (more permeable) and not “a less permeable aquifer” as stated. While surface recharge will increase the elevation of the water table as noted, the change in elevation will be greater when recharge occurs over “a less permeable aquifer” but it will occur in either scenario. The “slower water flow through the aquifer” also is dependent upon the effective porosity and not just the permeability and hydraulic gradient. Please modify these sentences.	Comment accepted: Th paragraph will be revised to remove the confusing statements.
25.	6-2	Section 6.1.1 Paragraph 2	The next to last sentence refers to “affects” but the correct term is ‘effects’. Please modify the sentence. Please correct the typographical error, “concentrationsduring”, in the last sentence.	Comment accepted: The sentence will be revised as suggested. Comment accepted: The sentence will be revised as suggested.
26.	6-5	Section 6.1.3 Paragraph 2	The paragraph states “However, the schedule for submitting the RI/FS report does not allow for anything more than limited collections of data...” Given the schedule proposed in the 2012 Plan, it is not clear why this statement is made. Please clarify. The paragraph also states “The basis for setting the action level is groundwater MCLs.” It appears reasonable to assume that action levels could also be based on risk based values for COCs and not just MCLs. Please clarify.	Comment accepted: This statement will be removed from the text. Comment accepted: This paragraph will be revised to include risk based values for action levels

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27.	6-6	Ibid Table 6-3	Please complete the table by providing entries for UXO (RDX, TNT) and Americium-241 and Carbon 14. It is assumed that "RDF" should be RDX.	Comment accepted: The table will be corrected for entries for RDX, TNT, Americium-241 and Carbon 14.	
28.	6-8	Section 6.1.4 Table 6-4	The table refers to the collection of data in FY-02 and -03 to support the ROD and "anticipated continuation as a post-ROD activity..." These statements should be revised to be consistent with the extension of the schedule as tied to OU 7-13/14 as noted on page 7-1. Additional time is available to collect data to support OU 10-08 and it should be noted in this table.	Comment accepted: This table will be revised to reflect the current schedule for OU 10-08 as it is tied to the date of the signature of the OU 7-13/14 ROD.	
29.	6-12	Section 6.2.1.1 Items 2, 3 & 4	Multiple vertical completions in this proposed deep well are certainly warranted. Discussions with EPA and IDEQ on the approach to be used for the multiple completions are anticipated.	Comment accepted: It is agreed that multiple completion or nested well sets are important for the proposed deep wells. Additional discussion with the agencies is anticipated.	
30.	Ibid	Third Bullet	Delete the second "of".	Comment accepted: The sentence will be revised as suggested.	
31.	6-14	Section 6.3.1 Task # 4 Paragraph 2	In the last sentence, replace the second "to" with 'the' for readability.	Comment accepted: The sentence will be revised as suggested.	
32.	Ibid	Task # 7	"Riskassessment" is presented as one word in the next to last sentence. Please correct.	Comment accepted: The sentence will be revised as suggested.	
33.	Ibid 6-15	Task # 10	It is very encouraging seeing an approach presented to obtain refined and more accurate ground water level data. This approach should provide everyone with a better understanding of ground water flow directions on the INEEL.	Comment accepted: No revision is necessary. Thank you for your comment.	

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34.	6-16	Section 6.4 Third Bullet	It is worth noting in parentheses that the schedule for OU 10-08 is tied to the schedule for OU 7-13/14. The assumption is valid but OU 10-08 must follow OU 7-13/14 over which WAG 10 has no control. Please add a noted pointing out this dependence.	Comment accepted: The tie and dependency of the OU 10-08 schedule to the signature of the OPU 7-13/14 ROD will be noted.
35.	Ibid	Seventh Bullet	Only ordnance sites defined in the OU 10-04 ROD can be included in OU 10-04. New ordnance items found via surveys or other means can be dealt with as part of OU 10-04 if those ordnance items are located within the bounds of those ordnance sites defined in OU 10-04. Ordnance items found outside the defined OU 10-04 site areas must be considered new sites unless the agencies agree to modify the OU 10-04 ROD to include new areas or definitions of the boundaries of those areas. This re-definition is possible should new survey techniques be applied that change the boundaries of previously defined ordnance areas such as the firing fan that originated at CFA. New ordnance sites that are not encompassed by the OU 10-04 ROD would be accommodated in the OU 10-08 or some other ROD post OU 10-04.	Comment accepted: The following statement will be added to the bullet: "New ordnance sites that are not encompassed by the OU 10-04 ROD would be accommodated in the OU 10-08 or some other ROD post OU 10-04."
36.	7-1	Section 7 Second Bullet	The bullet states "Impact of change: Submittal of documents may be delayed beyond working schedule delivery dates if EPA or IDHW review periods are longer than scheduled. Because of resource scheduling, document review comments submitted earlier than the scheduled dates may not accelerate resubmittal of a document." The intent of the last sentence quoted above is not consistent with sections 8.16 through 8.18 of the FFA/CO. Please revise this statement accordingly.	Comment accepted: The statement will be revised to correctly reflect the sections of the FFA/CO.
37.	7-1	Section 7 2 nd , 3 rd & 4 th bullets	Please see comment #11.	Comment accepted: The bullets will be revised as suggested to correct references to the IDEQ.

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38.	Ibid 7-1 – 7-3		Please present an enforceable schedule for appropriate milestones in the same format as Table 7-1 and Figure 7-1 for the working schedule.	Comment accepted: The schedule will be revised to correctly reflect the milestones.
39.	A-8	Appendix A Section A-3.1	Please replace the second “is” in the first sentence with ‘as’.	Comment accepted: The sentence will be revised as suggested.
40.	Ibid A-8	Section A-3.2	“TAN PWTF” does not appear in the acronym list. Please clarify the nature of this unit or correct if the intent is to refer to the New Pump and Treat Facility (NPTF) at TAN.	Comment accepted: The reference to the “Portable Water Treatment Facility” will be added to this section and to the acronym list.
41.	1-9	Section A-3.3 2 nd Item #2	Please replace “no” with ‘not’.	Comment accepted: The sentence will be revised as suggested.
42.	Ibid	Item #6	Please replace “no” with ‘not’.	Comment accepted: The sentence will be revised as suggested.
43.	Ibid	Paragraph 4 Last sentence	Replace “that” with ‘there’.	Comment accepted: The sentence will be revised as suggested.