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STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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Dirk Kempthorne, Governor
C. Stephen Allred, Director

February 10, 2003

Ms. Kathleen Hain, Team Leader
Environmental Restoration Program
Idaho Operations Office
Department of Energy
850 Energy Drive
Idaho Falls, Idaho 83401-1563

RE: Field Sampling Plan for the Waste Area Group 5, Remedial Action, Phase II

Dear Ms. Hain:

The Idaho Department of Environmental Quality (IDEQ) has completed its review of the above-referenced document and provides the enclosed comments. Both general and specific comments are provided. IDEQ received the Field Sampling Plan on January 10, 2003.

We look forward to working with your staff to address these concerns during the comment resolution period. If you have any questions regarding these remarks please contact Ted Livieratos or Daryl Koch at (208) 373-0217 or 373-0492 respectively.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ted Livieratos".

Ted Livieratos
WAG 5 Project Manager
IDEQ Technical Services Group

TL/jc

Enclosure

cc: Carol Hathaway, DOE-ID
Rick Poeton, EPA Region 10
Daryl Koch, DEQ-WMRD
CERCLA Source File
COF

GENERAL COMMENTS

- 1) In the *Design Optimization* sections on pages 3-4, 3-10, and 3-16, the following should be added: "Waste destined for disposal at the ICDF will be characterized in accordance with the *ICDF Remedial Action Work Plan, Appendix B, ICDF Complex Material Profile Guidance* DOE/ID-11046."
 - 2) In the *Soil Disposal Survey* sections on pages 3-5, 3-11, and 3-16, the following should be added: "required verification sampling will be performed in combination by the waste generator and ICDF samplers under the direction of the ICDF waste specialist (or designee) in accordance with the *ICDF Remedial Action Work Plan, Appendix D, ICDF Waste Verification Sampling and Analysis Plan*, DOE/ID-10985."
 - 3) A disclaimer should be footnoted or provided in the text noting the two different meanings of "verification", a) determining if the residual soil FRG has been met by the generator at the excavated site or b) determining if the Material Profile COC concentration does not exceed the ICDF WAC guidance limit in pCi/g or mg/kg.
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SPECIFIC COMMENTS

- 1) **Section 2, Figures 2-4 (Page 2-5) and Figure 2-5 (Page 2-6)**

Neither Figure reproduces well in black and white, as many details are not discernable in B&W version. Labels with arrows also would assist reader for various structures/features.

- 2) **Section 2.3.1, Second Paragraph, Page 2-10**

As discussed in multiple comments provided for the Remedial Design/Remedial Action Work Plan for WAG 5 (Phase II), this section would greatly benefit from additional text describing the excavation sequencing proposed for each area and the cognizance of prevailing wind directions impinging upon logical upwind toward downwind excavation operations.

- 3) **Section 2.3.1, Third Paragraph, Page 2-10**

It is recommended that air monitoring be conducted as indicated in specific comment number 14 regarding the work plan.

4) Section 3.14.3, Entire Paragraph, Page 3-3

The temporal provisions of soil sampling is critical, and directly related to the issue of, contaminated, wind-blown, re-deposited soils onto (otherwise) "clean" areas being sampled. For example, an area is excavated late on Thursday and, assuming a four-day workweek, the area is then surveyed on Monday morning for D.S. #2 (ROD) goal compliance. However, within the three day span, a high wind event was experienced in the area with the open excavation areas receiving a generous dose of dirty upwind area soils or, a stockpile of impacted soils that remained on-site from Thursday. These types of seemingly "non-related" parameters have now potentially (adversely) impacted the results of the confirmation samples. Please evaluate these types of scenarios for merit and modify any affected text, as appropriate.

5) Section 3.3.7.1, Figure 3-1, Page 3-17

Please provide a Legend entry that illustrates the boundaries of areas requiring an initial six-inch excavation and one that depicts the three-inch excavation areas (color differences would be helpful) or, alternately, these features can be represented on Figure 4-3 on Page 4-5.

6) Section 4.2, All Figures, Pages 4-2, 4-4-4, and 4-5

None of the Figures contained within this Section reproduced into black and white versions well. Shading is difficult/impossible to interpret. Please modify final versions to contain color versions.

7) Section 6.1.1.1, Section 6.1.1.1, Page 6-1

Please provide a description of tire/wheel contamination control procedures for the GPRS or reference a location in a related document that addresses this procedure.

8) Section 6.2.1, Bullets, Page 6-5

Same comment as above for GPRS; please add a bullet addressing track-around/dragout of contaminated soils into clean areas. Also a key consideration of waste minimization is the concept put forth in earlier comments regarding the waste excavation sequencing approach of "upwind to downwind" directional completions.

9) Section 6.2.7, Second Paragraph, Second Sentence, Page 6-8

Please describe the procedure to evaluate an "acceptable" container to be utilized in this project and the entity responsible for the container's evaluation.