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Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Field Sampling Plan for the Waste Area Group 5, Remedial Action, Phase II*

DATE: March 25, 2003 **REVIEWER:** State of Idaho Department of Environmental Quality

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
			General Comments	
1	General	General	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."	The suggested wording was added to Sections 3.1.1, 3.2.1 and 3.3.1 where the problem statements are described for each of the three sites, ARA-01, ARA-12 and ARA-23, respectively.
2	General	General	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 samples 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."	The suggested wording was added to Sections 3.1.7.2, 3.2.7.2, and 3.3.7.2 where the soil waste surveys are discussed for each of the three sites, ARA-01, ARA-12 and ARA-23, respectively.
3	General	General	A disclaimer should be footnoted or provided in the text noting the two different meanings of "verification," a) determining if the 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	The nomenclature was re-structured throughout the document. Samples collected to support Decision Statement #2 are now termed "confirmation" samples. Verification sampling is used in reference to samples collected for waste verification purposes.
			Specific Comments	
1	2, Fig. 2-4 and 2-5	2-5, 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 and features.	Final version of the FSP will be printed in color. The intent of the figures is to display the lateral extent of contamination at the sites. Additionally, the legend for each figure denotes the other features in the figure pertinent to the soil removal such as fence-lines and the rock pile at ARA-23.

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2	2.3.1, Second paragraph	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.	The following text was added to the second paragraph: "Excavation of the contaminated soils will be sequenced such that soil removal will begin in the farthest upwind area of each site, and proceed in the direction of the prevailing wind. Meteorological data for the site will be used for planning the excavations."
3	2.3.1, Third paragraph	2-10	It is recommended that air monitoring be conducted as indicated in specific comment number 14 regarding the work plan.	Air monitoring requirements are identified in the ARARs in the record of decision, and Appendix J of the WAG 5 OU 5-12 Phase II RD/RA Work Plan documents the estimated air emissions. Appendix J of the work plan shows that the dose at the site boundary is estimated at 2.54E-03 mrem/year which is well below the 10 mrem/yr. NESHAP limit. This FSP is specific to the field surveying and confirmation sampling for the three contaminated soil sites, and the air monitoring requirements are addressed in the work plan.
4	3.1.4.3	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.	Comment noted. To note, within the work plan and subsequent subcontract statement of work, the order of excavation will be laid out such that the excavation will proceed beginning at the upwind extent of contamination proceeding towards the downwind area in an effort to mitigate such effects.

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5	3.3.7.1, Figure 3-1	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, alternatively, these features can be represented on Figure 4-3 on Page 4-5.	The purpose of this map is to show the estimated lateral extent of the soil excavation at the ARA-23 site to provide the reader with a sense of the extent of the area that will require field surveying/sampling throughout the project. The depth of the excavations for each area is detailed in Section 3.3.7.1; however, the depth of the excavation has no bearing on the type of survey, nor the number of confirmation samples that will be collected. A statement has been added referring the reader to the RD/RA Work Plan for a detail of the excavation plan.
6	4.2, All figures	4-2, 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.	Comment noted. The final version of the FSP will be printed in color.
7	6.1.1.1	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.	Contamination control and decontamination procedures are addressed in the health and safety plan (HASP). As such, a statement has been added directing the reader to the HASP.
8	6.2.1, Bullets	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.	The second and third bullets address the issues of controlling the transfer of materials from contaminated areas, and constructing decontamination areas that minimize the generation of waste. A new bullet has been added: "Sequencing of excavation to minimize tracking of contamination into clean areas"

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9	6.2.7, Second Paragraph, Second Sentence	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.	This sentence has been deleted. The first sentence that identifies waste handling in accordance with the RRWAC, which specifically addresses waste handling and packaging requirements.