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Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: **Field Sampling Plan for the Pre-Remediation Sampling of the Central Facilities Area-04 Pond (DRAFT), DOE/ID-10994, Rev. C, May 2002**

DATE: June 21, 2002 **REVIEWER:** IDEQ

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
COMMENTS				
1	General		This document appears to contain the first reference to the revised mercury Final Remediation Goal (FRG) of 8.4 mg/kg, on page 2-1. The revised FRG is unaccompanied by any explanation as to the origin. Consider including a brief explanation of the FRG origin in the appropriate section.	A brief explanation of the FRG change has been provided in Section 2.2.
2	General		A discussion should be added concerning how the vertical analytical results from the 14 zones will be graphically displayed so as to be useful during the actual excavation of each zone.	A short discussion pertaining to the use of the data to define a three-dimensional representation of the contamination that will be used to direct the vertical excavation of soils within the areal extent of a zone has been added to Section 2.3.
3	General		There appears to be no discussion of the plans for the excavation of the asbestos contaminated construction debris. It is understood from discussions of the ICDF WAC relative to CFA-04 that there are expectations of disposal of approximately 100 yards of this material.	The excavation of the asbestos-contaminated debris will be described in the CFA-04 work plan that will be submitted to the Agencies for review later this year.
4	2.2	2-4	Last Paragraph of Section—Indicate that the OU 4-13 RI/FS estimate of the volume of mercury-contaminated soil (6,338 m^3) in the pond is based on a previous FRG that has been changed to 8.4 mg/kg.	This has been clarified in the text stating that the original estimate was based upon the original FRG with the final volumes based on the revised FRG and actual conditions encountered in the field.
5	2.3	2-4	Last Paragraph a. Third Sentence—The 10 percent is a minimum guideline and refers to the containers or truckloads excavated from zones of like contamination. The referenced sentence adds little value to this section, and we recommend it be deleted.	a. The sentence has been deleted. b. The sentences have been deleted.

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			b. Last Three Sentences—The discussion regarding OU 3-13 required verification sampling is inaccurate and should be deleted. Pre-excavation sampling cannot be used to reduce the verification and Quality Assurance requirements for the ICDF complex.	
6	3.1.2	3-2	Table 3-1—For "PSQ #2b," the significance of the 260 mg/kg concentration for total mercury is not understood. Please explain, and consider adding a footnote to the table.	A discussion pertaining to the significance of the 260 mg/kg concentration has been added to Section 2.3.
7	4.3	4-3	First Sentence—Figure 4-3 has been subdivided into 14 zones (not 13), as indicated on Figure 4-3, not Figure 4-2.	The text has been corrected.
8	4.3	4-3	Last Paragraph—There appear to be no locations on Figure 4-2, either on the figure or included in the legend, indicating areas "with concentrations below the final remediation goal of 8.4 mg/kg total mercury." Please correct this omission.	The figure has been corrected. The locations delineated by the blue "X"'s represented those with concentrations below 8.4 mg/kg.
9	6.1.2	6-1	First Sentence—Change "Figure 4-2" to "Figure 4-3."	The text has been corrected.
10	6.2.4	6-6	The description of potential CERCLA waste storage areas or waste storage units is too vague. This document must identify the ARAR for the type of storage unit (e.g., the unit will comply with the substantive aspects of 40 CFR 262.34 (a)(1)). Note that these ARARs must have been identified in the ROD which presented the remedy for CFA-04 in order to establish a CERCLA storage unit at this remediation site. Further, this FSP must include a waste management plan that describes the location and protective features (e.g., secondary containment, if required) of the storage area. The types of wastes that will be stored should be identified, as well as specific packaging and/or inspection requirements for those wastes.	The text referring to the creation of a new CWSU to support this project has been deleted. References to already established storage units at CFA and INTEC have been added to the text. The actual waste management plan for the CFA-04 project will be included as part of the CFA-04 work plan that will be submitted to the Agencies for review later this year. That plan will go into much greater detail pertaining to wastes generated during the remedial action efforts. The text contained in this FSP is specific to wastes generated as a result of sampling activities.

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11	6.2.7	6-7	a) General Comments—It is unclear why this section does not describe the process for disposing of waste in the ICDF, which should be the preferred disposal site for contaminated CERCLA wastes. The text should describe, or at least reference, the information in Section 3.1 of Appendix J of the finalized SSSTF Remedial Design/Construction Work Plan. In particular, Figure 3-1 of Appendix J describes the waste flow process and requirements for moving wastes from the generating site to the ICDF complex. The ICDF complex will have separate quality assurance and verification requirements, but those are not the responsibility of the generating site. b) First Paragraph—The term "Industrial Waste" must be defined in this document. Note that a suitability determination will be required for any CERCLA wastes that are disposed in the CFA landfills. c) Second and Third Paragraphs—CERCLA wastes that are determined to be contaminated above risk-based concentrations with hazardous or radiological contaminants should be sent to the ICDF as a first disposal choice. The ICDF complex includes a RCRA-compliant storage area for CERCLA wastes awaiting disposal in the ICDF landfill. It is unclear why this section refers to terms of existing "Master Task Agreements," the "SMO/WGS," and the "RRWAC." See part (a) of this comment.	a) A waste management plan for the CFA-04 project will be included as part of the CFA-04 work plan that will be submitted to the Agencies for review later this year. That plan will go into much greater detail pertaining to wastes generated during the remedial action efforts. b) A definition of industrial waste has been provided along with a reference to the appropriate regulation. A suitability determination is not necessary as the waste originates from within the same site as to which it will be disposed. c) A statement has been added to the third paragraph clarifying that it is the intent to dispose of all waste streams at the ICDF in so much as they meet the facility's WAC. The master task agreements, SMO/WGS, and RRWAC are mentioned in the event that the need arises. To note, WGS will be involved in any waste disposed, including that going to the ICDF.