INEEL
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:** EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
COMMENTS				
1	2.2	2-1	First Paragraph, Last Sentence—It would be useful to have an explanation for the change to the final remediation goal from the level included in the Record of Decision because this FSP is the first formally submitted document to include this value.	A brief explanation of the FRG change has been provided in Section 2.2.
2	3.1.2	3-2	Table 3-1—It would be helpful to have some background on the decision to analyze for chromium and silver as well as the specific radionuclides listed in Section 3.1.3.2.	A discussion pertaining to the reasoning behind these analyses has been added to Section 2.3.
3	6.1.2	6-1	Second Paragraph, First Sentence—The technical procedures for sampling with a hollow-stem auger should be included in an appendix or summarized in this section.	A summary of the sampling approach using the hollow-stem auger has been added to this section.
4	6.1.2	6-2	Table 6-1—The modified analytical method for methyl mercury needs to be described and the source of the procedures for this method should be referenced.	The method reference has been changed to EPA Method 1630 which is specific to the analysis of samples for methyl mercury.
5	6.2	6-3	First Paragraph—This section lists a number of INEEL internal procedures for the handling, storage, and disposal of characterization waste. Identifying internal procedures is not inappropriate, but it should be clarified that management of CERCLA remediation waste must be in line with the Record of Decision requirements including ARARs that apply to temporary storage and the plan to disposal of material contaminated above risk levels to the ICDF.	A paragraph has been added clarifying that the CERCLA remediation waste will be maintained in a previously established CWSU until such time as it can be disposed at the ICDF.
6	6.2.1	6-4	Third Paragraph, First Sentence—A definition of "industrial waste" should be provided along with the explanation of how this waste differs from material contaminated above risk levels which is intended for disposal at the ICDF.	A definition of industrial waste has been provided along with a reference to the appropriate regulation.

INEEL
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:** EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
7	6.2.3	6-5	This section which describes packaging and labeling of containers for storage and transport should describe requirements for "CERCLA remediation waste" rather than "hazardous waste." Might there be any additional container or labeling requirements for eventual disposal to the ICDF, for example, labeling the containers as "CERCLA waste" and marking the container with an accumulation start date?	The text has been clarified to require the waste to be labeled with CERCLA remediation waste labels which will include a waste accumulation start date. To note, a more detailed waste management plan will be included with the CFA-04 remediation work plan when it is submitted.
8	6.2.4	6-6	This section describes temporary storage of waste in a CERCLA waste storage unit (CWSU). EPA understands from the conference call on 6/5/02 with DOE and IDEQ that this waste would be stored in a currently established CWSU. The nature and location of this CWSU should be described and a statement should be added that EPA and IDEQ will be notified if there are plans to establish a new CWSU. Also, it is not clear why waste intended for the ICDF would not instead be shipped for storage in the INTEC CERCLA storage area.	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.
9	6.2.7	6-7	This section should provide more specific information about the type and level of contamination that may be encountered at CFA-04 during sampling activities and associated waste disposal requirements (i.e., Hg above the FRG, 0.2 μg/L Hg, 260 mg/kg Hg, and/or rad contaminated soil).	A paragraph has been added providing specific categories of mercury contaminated waste that may be encountered.
10	6.2.8	6-7	Will sampling waste information also be recorded in IWTS?	All information pertaining to waste tracking and disposition will be entered into IWTS. A sentence clarifying this has been added.

INEEL
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:** **EPA**

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
11	6.3.2, 6.3.3, and 6.3.6	6-8 through 6-9	A disposal location for liquid, solid, and analytical residues is not listed.	These sections have all been clarified to state that the ICDF is the intended disposal facility for the identified waste streams. In the event that a waste stream does not meet the ICDF's waste acceptance criteria, an alternative treatment and disposal facility will need to be identified.
12	7.3	7-3	It should be added that substantial revisions to this document requires agency concurrence.	A statement has been added to this section requiring Agency concurrence for any significant changes to the document.
13	Appendix B	—	Sampling and Analysis Plan Tables—These tables identify a number of samples to be analyzed for methyl mercury, but it is not clear how these samples will be used to determine a percent methylization of mercury representative of the CFA-04 pond conditions. A description of how these samples will be used to meet objectives should be included in the body of the text.	A statement has been added to Section 3.1.3.3 clarifying that the methyl mercury data set will be correlated to total mercury data obtained from the same samples thereby allowing a direct comparison of the two parameters, hence percent methylization.