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PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
COMMENTS				
1			It states in the text that existing sites other than 10-08 do not need additional risk assessments or feasibility studies performed on them; however, please indicate in the text that any new sites discovered in the 10-08 area may require a risk assessment and/or a feasibility study. (AP)	Accept. The text will be changed to indicate that new contamination release sites that may be identified in the future anywhere on the INEEL after a WAG Comprehensive ROD has been signed will be fully evaluated either in OU 10-08 (or, if necessary, opening up a individual WAG's ROD). This evaluation under OU 10-08 may consist of a risk assessment, and, if a site poses unacceptable risk, a feasibility study. However, the intent of the OU 10-08 ROD is to be a contingent ROD. Meaning that new contaminant release sites identified after the OU 10-08 ROD has been signed will use a modified Track 1 or Track 2 risk evaluation process and sites that pose unacceptable risk will already have a selected remedy identified in the OU 10-08 ROD.
2			The text indicates that the collection of new data will be eliminated to the extent practicable, with the use of historical groundwater data, however, the text should specify that new sites that are not fully characterized will require additional data collection in order to determine the threat of these sites to groundwater. (AP)	Comment incorporated as suggested. We have included the following statement in section 4.1: "However, new sites that are not fully characterized may require additional data collection in order to determine the threat of theses site to groundwater."

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
3			The draft report does not present the conceptual model for future groundwater evaluations. However, in section 5.11, p. 5-12, the last reference is "WAG 10 Groundwater Modeling Strategy and Conceptual Model, INEEL/EXT-01-00768, Rev. B". Depending on how the groundwater modeling proceeds and if the information in this document will be used as the conceptual model for future numerical modeling, the review of WAG 10 Groundwater Modeling Strategy and Conceptual Model, INEEL/EXT-01-00768, Rev. B, will be necessary before conducting any future numerical simulations. (JK)	INEEL/EXT-01-00768 contains much of the conceptual model needed for numerical modeling at the WAG 10-08 scale. Copies will be provided.
4	1	General	The scope and role of this operable unit requires clarification. The text supports an administrative role for the RI/FS. However, O.U. 10-08 does address: new sites not otherwise evaluated; site-wide institutional controls; and site-wide groundwater. While it is true that RAO's have been established for all but OU 7-13/14 & OU 3-14, this OU should at a minimum identify monitoring optimization opportunities for existing remedial decisions.	Section 1 will be revised to indicate that the scope of OU 10-08 will include identification, characterization, and required remedial action at new sites not otherwise evaluated and optimization of monitoring across the INEEL. Site-wide institutional controls are to be addressed under OU 10-04 as agreed previously with the agencies.
5	1	General	As monitoring is for the purpose of assuring protectiveness, incremental risks from other non-CERCLA cleanups may result in action thresholds being exceeded. Therefore, one product of this RI/FS will be to assess points of compliance, action levels and contingency actions, which may be outside of the areas of concern established for other O.U.'s.	Section 1 will be revised to specify that an objective of OU 10-08 will be to assess points of compliance, action levels, and contingency actions across the INEEL.

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
6	1	1-2	Second Bullet: There are different models being used at the TAN, INTEC and RWMC-SDA operable units. Is model update or model consolidation the appropriate term here?	The 10-08 model is designed to address sub-regional issues and to integrate and support the facility specific WAG contaminant transport models. New information will be used to update the 10-08 model. The 10-08 model will be used to evaluate assumptions, hypotheses, and concepts at an INEEL or sub-regional scale and the results will be used as appropriate to update the other WAG modeling efforts. Achieving model consistency and integration across different scales is the goal. Eventually, model consolidation may be needed. The text will be revised to make this approach more clear.
7**	1	1-2	Tenth Bullet: Ensure compliance with MCLs and cumulative risk thresholds in the groundwater from INEEL releases, whether on or offsite	Accept. Additional wording will be added to the bullet that states "Ensure compliance with MCLs and cumulative risk thresholds in the groundwater from INEEL-released contaminants whether on or offsite by 2095." Also see statement below which will combine bullets 10 and 11.
8	1	1-2	Last Bullet: Although contaminants have not been detected >MCL beyond INEEL's boundary, off-site contamination has been detected and needs to be understood	Accept. Bullets 10 and 22 will be combined for clarity. Additional wording will be added to the bullet that states "Ensure compliance with MCLs and cumulative risk thresholds in the groundwater from INEEL-released contaminants whether on or offsite by 2095. Additional groundwater monitoring, additional groundwater monitoring wells, deep vertical profile wells and evaluation of existing and new groundwater sampling data will be utilized to evaluate the location and movement of potential and known

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

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DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
8 continued				contaminants upgradient from, at or downgradient from the INEEL boundary. If a groundwater contaminant plume not attributable to any individual WAG in particular was found to exceed MCLs and was determined to be migrating offsite, the extent of that plume, and any potential receptors and potential impacts on those receptors would also have to be examined."
9			Accidentally left blank?	
10	1	1-2	Third Paragraph: Please insert the term analytical into the last sentence so that the text will read "...preparation of groundwater elevation and analytical data...". (JR)	Accept. The suggested wording will be added.
11	1	1-2	Second Bullet: The second overall objective for this work plan is described in the text as "Update existing groundwater models, perform limited additional monitoring, analyze existing groundwater data, and the collection of critical additional groundwater data." Several points in this statement require elaboration additional details and descriptions in order to understand what methods will be employed to achieve the stated objective. (JR)	Additional text will be added to clarify the approach.
12	1	1-2	What sites and which models are being referred to by "Update existing models..." and how will the models be updated? How will different model predictions be equilibrated and/or integrated to provide input to the site wide model. (JR)	Additional text will be added to clarify the approach.

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
13	1	1-2	What specifically does the text refer to by the statement "perform limited additional modeling". Please provide additional details in the text identifying which models and sites are being referred to and what will constitute the limited additional modeling. (JR)	The limited additional modeling refers to the 10-08 model. Additional text will be added to clarify the approach.
14	1	1-2	What data is being referred to when the text states "...analyze existing groundwater data, and the collection of critical additional groundwater data". Does this portion of the text refer to groundwater elevation data and analytical data? How will the data be further analyzed? In addition, what are the critical additional data being referred to and where will these data needs be identified? (JR)	Accept. Yes, this critical groundwater information does include both groundwater elevation data and analytical data. All groundwater data available from all of WAG groundwater measuring and sampling events will be incorporated into the WAG 10 sitewide groundwater evaluation process. This existing data will be plotted on a sitewide basis to determine the location and trends of existing groundwater contaminant plumes and locations of potential data gaps. The data gaps identified will be filled by either additional measurements and sampling of existing wells or the installation of new wells where no wells exist. Some of the probable areas for additional data needs are at the upgradient and downgradient INEEL boundaries, in vertical sampling gaps in the deeper portions of the aquifer, and in possible location along localized structural trends that may be moving groundwater in a direction different than the regional groundwater flow direction. Currently unknown data gaps may also be identified as a result of the sitewide groundwater modeling efforts.

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

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DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
15	1	1-2	In a recent report, groundwater elevation measuring points for many of the wells at INEEL were determined to have variable degrees of vertical control errors ranging from several hundredths of a foot to over two feet. The impact of that range in error on the accuracy and interpretation of existing groundwater elevation data may be significant.. This vertical control error issue should be addressed on an INEEL site wide basis as the erroneous data will impact interpretation of local WAG groundwater flow directions and predictions of regional aquifer and particle flow directions and velocities. Perhaps this issue should be included as one of the critical additional data needs mentioned earlier in this, the second, bullet. (JR)	Agreed. Careful review of all groundwater elevation control points is needed in order to use the depth to water data from various sources. It is agreed that the need to have accurate information on groundwater level information is critical to the successful plotting and interpretation of groundwater flow directions. It is currently planned to ensure the accuracy of this information that the wells that are utilized for monitoring and plotting purposes for groundwater for WAG 10 OU 10-08 will be rechecked for accurate surface survey information and correction factors used for groundwater measurements based on well deviations. All the wells will be rechecked for deviations and correction factors using the latest USGS digital gyro instrument. To ensure the continued accuracy of the surface elevation information, a revision to the well measuring procedures will include measurements of well stickups, and height of well measuring point and top of casing elevation above the surveyed brass cap elevation for each well during each well measuring and sampling event. This additional measuring information will identify any changes to the well measuring points from previous measuring events.
16	1	1-2	Sixth Bullet: Another objective of the Wag 10-08 RI/FS is identified as "Support the development of a sitewide subregional groundwater model for contaminant flux through the site." How will individual contaminant plumes that are being modeled by each of the individual WAGs be integrated into the subregional groundwater model for the entire INEEL site? What type of model will be proposed to perform the subregional simulations? Please include these additional	At this point, the 10-08 Site Wide Groundwater model is designed to simulate flow and advective velocity, not contaminant concentrations. The words "contaminant flux" were intended to address the potential for offsite contaminants to move through the site. Possible paths and velocities of offsite contaminants will be evaluated and only if conditions warrant, will consideration be given to additional sophistication. There are no immediate plans to

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DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
16 continued			details and specifics for the subregional model for contaminant flux. (JR)	develop an integrated contaminant transport model. The text will be clarified.
17	1	1-2	Last Bullets: The last two bullets (tenth and eleventh) of this section identify the INEEL boundary as the limit of the extent of WAG 10 interest in groundwater quality. If, however, a groundwater contaminant plume not attributable to any individual WAG in particular was found to exceed MCLs and was determined to be migrating offsite, the extent of that plume, and any potential receptors and potential impacts on those receptors would also have to be examined. (JR) Suggestion: The second of these two bullets should be deleted as it restates the same facts as the previous bullet.	Agree. Please refer to comments #7 and #8 above for the statements and bullets that will be combined and expanded. It is understood that that the goal of the sitewide groundwater program is to ensure compliance with MCLs and potential risk factors both beneath and downgradient from the INEEL for contaminants in the groundwater that resulted from previous INEEL activities.
18**	2.9	2-18	As stated in the FFA/CO Action Plan at page 29, "The boundary of WAG 10 is the INEL boundary, or beyond..."	Comment incorporated as suggested. The sentence in Section 2.9 now reads, "The FFA/CO delineates WAG 10 as comprising miscellaneous surface sites and liquid disposal areas throughout the INEEL that are not included within other WAGs and are outside the 9 major facilities. WAG 10 also includes regional Snake River Plain Aquifer concerns related to the INEEL that cannot be addressed on a WAG-specific basis. The boundary of WAG 10 is the INEEL boundary, or beyond as necessary."

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
19	2.9.2.1	2-19	First Paragraph: This section of the text discusses the fact that multiple plumes from the same WAG and from multiple WAGs will be evaluated for the potential for the plumes to overlap or commingle. Data documenting the vertical extent and concentrations of contaminants within individual monitoring well boreholes however, is not generally being collected at most of the WAGs at this time. If the extent to which the plumes overlap and commingle is to be studied than data that identifies the vertical distribution and concentrations of contaminants within SRPA will have to be collected to support the modeling effort. (JR)	Accept. Part of the plan for the RI/FS work plan and post-ROD activities will be to sample and evaluate the vertical extent of contaminants in existing wells and drill and sample new vertical profile wells to evaluate the vertical extent of contaminants in the aquifer where no well currently exist. The locations and process for the vertical profile well sampling will be established as part of the RI/FS work plan. An additional statement added this work to the work plan activities in Section 4.3 will also be added.
20	3	3-1	General: The Track I / II Process was developed based on the Limited Field Investigation Process described in national guidance. It is not a substitute for a Baseline Risk Assessment. It allows pertinent information to be gathered which can be used to focus any additional required remedial investigation.	Comment incorporated as suggested. We have added the sentences, "The Track 1 and 2 process was developed based on the limited field investigation process described in national guidance. It is not a substitute for a baseline risk assessment, but allows pertinent information to be gathered that can be used to focus any additional required remedial investigation."
21**	3.1	3-1	All Track I/II Project Manager decisions are incorporated into the RI/FS, as the remedial decision is made through a ROD, signed by the authorized Agency representative. The PM's do not have authority to sign a ROD.	Partial accept. The text will be clarified so there is not a misunderstanding about the purpose of this section. The discussion on the Track 1 and Track 2 process should not lead the reader into thinking that the PMs would be signing a ROD. However, a mechanism does need to be developed to address new potential release sites that are identified after OU 10-08 ROD is finalized.

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
22	3	3-2	Table 3.1: Considering that all 47 of the Track I's listed are awaiting Agency approval, It is unclear the value afforded by including one Agency's recommended action?	We have removed the column that listed the DOE recommendation and have updated the status column to reflect the sites for which the Agencies have agreed on NFA or added sampling under a Track 2.
23**	3.2	3-6	General: It is unclear as to what authority the previous agency description is based on. The description should be citing references and priority should be given to the ROD Declaration descriptions concerning remedy type, RAO's and RG's. The next level of description should be the final as built RD/RAWP. This section should stick to basic facts and not give assumptions or the opinions of one of the three agencies, unless referenced	Section 3.2 will be revised to focus on basic site descriptions, the remedy as stated in the RODs along with the RAOs and FRGs, a brief summary of the RD/RD plans, and the status of the remediation.
24	3.2.1	3-7	General: The information in this section appears dated and needs updating. It confuses the 1995 ROD implementation with the 2001 ROD Amendment requirements.	Accepted – the references will be corrected.
25**	3.3	3-16	Cumulative risk as determined through the Baseline Risk Assessment is a requirement of the NCP. MCL's are an ARAR which may not be protective when cumulative risk concerns are evaluated.	Accepted – Section 3.3 will be revised to explain that risk evaluations will be conducted for surface media as required for potential new sites, and for groundwater. The results of the risk assessment will be used in conjunction with ARARs (e.g. MCLs) to determine if a need for remediation exists and, if so, to help chose between alternative technologies.

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
26**	3.4.1	3-17	Second Bullet: As a sitewide OU with responsibility for Institutional Controls, it is important that land use considerations play an important part in the risk assessment process rather than merely apply a single management strategy. The INEEL needs to be assessed as far as if or when certain areas may become available for subsistence farming scenarios.	Partial accept. The responsibility for Sitewide institutional controls will be addressed in the OU 6-05/10-04 ROD. The preliminary RAOs will be revised (see response to EPA comment #25)
27	3.4.1	3-17	Last Bullet: The text states that in order to protect human health in the future the sitewide groundwater issue is to "Prevent ingestion of groundwater with contaminant concentrations exceeding MCLs." Please provide additional information on what criteria will be used to evaluate the contaminants for which there are no MCL or for the combined effects of ingestion of multiple contaminants. Please include additional information on the how these compounds will be evaluated as part of the model for contaminant flux through the site. (JR)	This sentence will be revised by adding "or risk based concentrations" at the end. It will also be explained in the text that preliminary remediation goals will be developed under the RAOs for COPCs corresponding to all exposure pathways, and will be refined with COCs resulting from the RI/BRA tasks. It will also be stated in this section that risk-based levels for protectiveness will be defined that result in a risk number of 10-6 and 10-4 or a HQ less than 1 and evaluated against ARARs to determine preliminary remediation goals for screening and detailed evaluations.
28**	3.4.1	3-17	Last Bullet: Groundwater ingestion is not the only pathway associated with VOC's. Inhalation is also an important component within a residence.	Agreed – The pathways inhalation of water vapor and ingestion of homegrown produce will be added to the RAOs for groundwater.
29	3.4.2	3-18	Sixth Bullet: It appears that ex-situ treatment, storage and disposal means both on and off-site. These should be separated due to the differences in AOC and ARARs	It is recognized that on- and offsite disposal will be considered in the development of alternatives in the feasibility study and that appropriate ARARs for the respective actions will be identified. However, whether disposal occurs on- or offsite, these response actions are still considered variations of the same general response action and further delineation in the work plan is not necessary.

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
30**	3.4.2	3-19	Threshold Criteria: All applicable CERCLA guidance defines Overall Protectiveness... and Compliance with ARARs as the two threshold criteria. Effectiveness, implementability and cost are balancing criteria which are used to guide the development and screening of threshold passing remedial alternatives.	Accept – Long-term effectiveness and permanence will be listed under Balancing Criteria.
31	3.5	3-21	General: TBC's should also be identified	Accept – TBCs will be defined and added to the ARARs discussion.
32	3	3-22	Table 3.2: The ARAR listing is too vague. The ARARs need to be divided into chemical, action & location specific and administrative requirements excluded. Also TBC's should be listed	The ARAR listing will be revised to make it clear which requirements are chemical, action, and location specific, and the TBCs will be listed separately. A more extensive discussion will be provided to explain that this is only a preliminary identification of ARARs based on characteristics and contaminants present at the other WAG sites, and that further identification and definition of ARARs will be conducted and presented in the FS when it is known what remedial actions are required and alternatives have been developed for detailed analysis.
33	4.1	4-1	Please define "a graded DQO process." (AP)	The graded approach focuses on applying the appropriate level of effort to the particular project. For OU 10-08, it was recognized that a Grade 4 or full DQO process was not required; but this project was more complex in nature than should be addressed by the abbreviated DQO approach; instead a "Condensed" DQO (Grade 2) approach was used.
34**	4.1.1	4-1	Problems: There should be a problem statement for I.C.'s.	Comment noted. Per agreement with the agencies, I.C.'s will be addressed under OU 10-04.

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
35**	4.1.1	4-1	Problems #2: Stating the problem as the effectiveness of the remedial action is too broad, it may be better to state the effectiveness of the model and performance standards established	If predicted future concentrations at the INEEL boundary are the issue, then evaluating the effectiveness and accuracy of the models and other predictive tools should be included in the problem statement.
36	4.1.1	4-1	Problems: The one sentence issues are not equivalent to the guidance that calls for developing a concise description of the problem?	Accept. We will rewrite the problem statements to better follow the guidance and to develop a concise description of the problem.
37**	4.1.1	4-1	Table 4-1: The listing of O.U. specific COC's may be both inaccurate and too limiting which could improperly focus the problem statement. For example, PCE and Cs-137 are also identified as COCs in the vicinity of the TAN injection well. Limitations in sampling during the RI may also result in data gaps that require assessment.	Agree: Tables 4-3 and 4-1 will be switched to better represent the planned groundwater sampling constituents. The table of identified site-wide facility-identified contaminants was used to focus the type of analysis that would be needed for the sitewide groundwater sampling so that no ROD-specified COCs were missed during sitewide groundwater sampling. Based on this facility –specific list, the sitewide groundwater sampling list was prepared. Table 4-3 (previously Table 4-1) will spell out the various classes of contaminants and analytical method that will be used for the sitewide groundwater sampling events.
38**	4.1.2	4-4	Table 4-2: It would be more productive if the 'Principal Study Questions' were also listed here.	Accepted – the table will be modified as suggested.
39	4.1.2	4-4	Table 4-2: Given that there are multiple decisions required for this DQO process, organizing the process in the form of a flowchart as depicted at Figure 2-1 in EPA QA/G-4 (EPA/600R-96/055) would be helpful.	Accept. A flowchart as depicted in the referenced EPA guidance will be incorporated into this section.

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 **REVIEWER:** EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
40		4-5	Table 4-3: Analytical Method Section. Please indicate the EPA method "Appendix IX Group" refers to. (AP)	Comment incorporated as suggested. This typographical error has been corrected and the table now shows that all the VOCs are via USEPA Method 8260-B.
41**		4-5	Table 4-3: An important consideration is the 'representativeness' of the data. Will an assessment of the monitoring locations be made to determine if their samples are representative of vertical and planar concerns?	Comment noted. Yes, an assessment of the monitoring locations will be made to determine if the samples are representative of vertical and planar concerns.
42**	4.1.4	4-7	Spatial is contaminated groundwater associated with INEEL releases	Agree: This statement will replace the existing statement in the Description section of Table 4-4
43	4.1.5	4-7	Please define "adequately" in decision rules #1a and 1b for wells that will be used in this RI/FS. For example, define adequate such that the number of wells defines the boundary of contamination, wells are located outside of this boundary and are non-detect for target analytes, and wells beneath source areas have been sampled for all analytes found in soil/surface contamination at the corresponding source location. (AP)	Accept – the text will be modified as suggested.
44	4.1.5	4-7	Decision rule #2a and #2b. If the temporal boundary of the WAG 10, OU 10-08 study is two years as indicated in Table 4-4, then why will the MCL's be evaluated during the 5 year review versus the two years to determine if they will be achieved within 100 years? Please clarify the text. (AP)	The temporal boundary discussion in Table 4-4 will be revised to clearly state that groundwater monitoring data will be evaluated on an annual basis and assessments will likewise be updated annually. The results of the annual assessments will be summarized every five years as part of the 5-year review process. The Decision Rule 2a and 2b will be revised to indicate groundwater evaluations will be performed annually, and whenever results indicate a condition may exist requiring

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 **REVIEWER:** EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
44 continued				further investigation, the agencies will be notified and appropriate plans will be prepared and implemented. Every five years (corresponding to the 5-year review period) a comprehensive summary of activities and decisions will be prepared.
45	4.1.6	4-8	This section describes tolerable limits on decision errors and indicates that the major source of error will be omission (i.e., contaminants not identified in the historical records or in collected analytical analyses). DOE should perform a historical search of surface contaminated soils and spills and compare the results against the analyses in groundwater samples collected to characterize the site. Such a comparison would indicate if omission could be identified from the source to the groundwater receptor. (AP)	The section reflects discussions with the Agencies representatives in February 2001. The assumption for OU 10-08 was that the individual WAGs have previously evaluated soil contamination and groundwater and associated risks If newly identified contamination is observed in the groundwater, then on a case by case basis an evaluation will be conducted by DOE
46	4.1.7.1	4-8	First Bullet: This bulleted item states that limited groundwater monitoring data will be collected to assess INEEL site-wide boundary and perimeter groundwater quality. If current wells are determined insufficient to adequately determine the boundary or nature of groundwater contamination, new wells may be necessary. Also, if new sites are discovered within the10-08 site, additional groundwater wells may be necessary. Please include a discussion about the need for additional data and/or groundwater wells in the design assumption list. (AP)	Accept. Additional statements /or assumptions will be added that indicate that additional data and/or new wells will be added as a necessary to fill data gaps identified during the RI/FS data evaluation process.

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
47	4.1.7.1	4-8	Last Bullet: How will the site-wide groundwater modeling efforts be revised to incorporate new information?" What is meant by "site-wide modeling" efforts? (JK)	Site-wide modeling refers to the 10-08 model scale. See INEEL/EXT-01-007688, copies of which are being provided. New information on geometry (e.g., aquifer thickness), hydraulic properties, water elevations, etc. will be used to update the conceptual and numerical models. New information obtained at the facility specific scale will be used as appropriate for the larger scale model.
48	4.1.7.1	4-9	First Bullet: Section 4.1.7.1, page 4-9, First bulleted item. How will the groundwater contaminant flux into and out of the site be modeled? What contaminants will be modeled? Will a conceptual model be created? The results of the modeling will be used for what purpose? (JK)	See response to comment # 16
49	4.3.1	4-9	Task #1: The comprehensive groundwater sample data base needs to be cross referenced to location specific lithological data if there is interest in using the data base predictively.	Accept: It is currently planned that the groundwater database will include both the groundwater analytical data and the well completion and borehole drilling logs. Thus the groundwater analytical data can be compared to the borehole log information but there is no plan to tie the two directly in the database due to uncertainty of these connections between lithology and sample results, especially in the large open bore hole intervals common at the INEEL.

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
50	4.3.1	4-9	Task #2: Will only CERCLA groundwater data be evaluated?	Accept: More than just CERCLA groundwater data will be evaluated. Any information available, such as USGS data and data from upgradient non-CERCLA wells, will be evaluated to provide as complete a picture of groundwater contaminants as possible will be utilized. The text will be revised to identify the sources of groundwater data, which will include at a minimum the USGS monitoring data and the specific groundwater monitoring results from the various WAGs.
51	4.3.1	4-9	Task #7: This task is actually to investigate plant uptake by mercury for the dual purpose of evaluating phytoremediation opportunities and to collect better data for assessing food crop uptake for the baseline risk assessment.	Accept – the text will be revised as suggested.
52	4.3.1	4-10	For what purpose will the advective velocity flow field be used? What new information may potentially be used to update the advective velocity flow field? Any modeling or calculations previously conducted to calculate the advective velocity flow field would need to be reviewed before proceeding with any updating of these calculations or simulations. (JK)	The advective flow velocity field will be used to estimate groundwater pathlines and velocities at the sub-regional scale, integrate the smaller scale flow systems, obtain a INEEL scale groundwater flow balance, assure flow consistency in the other WAG models, and provide support for the other WAG model flow boundary conditions. See the response to comment #48.
53**	4.4	4-11	Fourth Bullet: As stated previously both cumulative risk and MCLs are important in determining if a remedy is protective	Agreed – this statement will be deleted as an assumption. It will be explained in the text that that risk-based levels for protectiveness will be defined that result in a risk number of 10-6 and 10-4 or a HQ less than 1 and evaluated against ARARs (i.e., MCLs) to determine preliminary remediation goals for screening and detailed evaluations.

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 **REVIEWER:** EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
54**	5.1.2	5-2	The text states that the QAPP for this project is not included as an attachment but is included in the administrative record. Updates to the site-wide generic QAPjP should be included in this Work Plan. For example, when the DQO process meets Agencies' needs, there will different DQO's for different monitoring locations. Critical samples require a higher degree of QA/QC which should be discussed in this Work Plan	It is acknowledged there will be instances when higher levels of QA/QC on sampling and analysis will be required than indicated in the site-wide QAPjP. The work plan will be revised to indicate assessments will be performed for monitoring locations and monitoring conditions, and that additional QA/QC requirements will be specified when warranted, such as to confirm detection of contaminants (e.g., americium, plutonium, iodine-129, etc), define plume boundaries, obtain data to refine statistical accuracy/precision, etc.
55	5.3.1.2	5-3	If EPA methods will be used for organic and inorganic analyses then the corresponding National Functional Guidelines for Data Validation should also be used for validation. (AP)	Whenever EPA methods are used, the data validation is performed according to the National Functional Guidelines for Data Validation.
56**	6	6-1	The FFA/CO enforceable deadline dates for the draft RI/FS and the draft ROD and the Critical Path Method schedule for achieving these dates are required in addition to working schedule critical path method.	Accept. The enforceable deadline dates for the draft RI/FS and the draft ROD and the Critical Path Method schedule for achieving these dates will be added.
57	Appendix B		General: There should be a section on surface hydrology as the relationship between surface water areas and the perched zone relates to the remedial decision process.	Partial accept. Sections B1, B1.1, B1.1.2, B3, B3.1, B3.2 and B3.3 do discuss the relationship and movement of water from the surface through the vadose zone and the perched zones. The discussions presented in Appendix B are discussion of the general movement of water through the vadose zone, perched zones and the aquifer and are not related to the movement of a particular remediation process or site since WAG 10 is primarily involved in issues dealing with the aquifer. The information from Appendix B will be added to the main document.

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
58	Appendix D		General: Given that many remedial decisions are based on projections 90 years in the future, a discussion on meteorological trends is also appropriate here.	Accepted – a discussion on long-term climatology predictions for the next 100 years will be included as suggested.
59	Appendix E		General: This section should derive from the OU 10-04 RI/FS and points up another problem statement for the DQO process, i.e., monitoring for ecological protectiveness.	Comment noted. We will review the RI/FS and revise the appropriate sections of Appendix E.
60**	F2-2	F-8	Appendix F: Given that this OU is responsible for site-wide I.C.'s the future use scenarios should be more specific, temporally and spatially based.	Site-wide institutional controls are to be addressed under OU 10-04 as agreed previously with the agencies.
61**	G.2	G-5	Appendix G, First Bullet: Industrial waste which contains 'hazardous substances' are subject to CERCLA and must be managed as 'Investigation Derived Waste.' Any waste shipped off-site would be subject to the "Off-site Rule"	Accepted – the text will be revised to explain that industrial waste generated during CERCLA investigation and remedial action will be managed as IDW and if sent off site for disposal will be subject to the "Off-site Rule.
62	Appendix G	G-6	Table 6-1: What does "uncontaminated mean' for drill cuttings, media, etc. ? How will this determination be made?	For each waste stream produced, in accordance with 40 CFR 262.11, a hazardous waste determination will be performed and documented before disposal of all waste including drill cuttings.
63	G3-3	G-8	Appendix G: There should be a discussion concerning 'compatibility' issues and identification of ARARs that will be followed if	The text will be revised to explain that waste compatibility will be determined as part of waste characterization and designation, and incompatible waste will be separated as required by RCRA container management regulations.
64**	FSP		General: Comments made above are not duplicated again for this component of the RI/FS Work Plan	Comment noted.

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 **REVIEWER:** EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
65	1.1	1-1	Second Paragraph: The generic QAPjP for INEEL is not a stand alone document. It represents the minimum QA/QC program and is to be supplemented for OU-specific concerns.	Comment incorporated. It is acknowledged there will be instances when higher levels of QA/QC on sampling and analysis will be required than indicated in the site-wide QAPjP. The FSP will be revised to include a table specifying the QA/QC requirements.
66	1.3	1-1	The QA and applicability of the existing database for each parameter needs to be addressed. For example how are changes in analytical procedures factored into data usability?	Comment noted. Compliance to the analytical protocol is determined during the L&V process by evaluating the data against contractually mandated reporting and QA/QC criteria. In addition, the database will contain flags or codes to alert the user to the method or procedure used. Also, older analytical data that may have been analyzed by other analytical methods, or analyzed to different detection limits will be flagged in the database as "historic" data to alert the user that the level of QA/QC or analytical methodology or detection limits may be different than newer data. Also, the data base will include information on analytical methodology, detection limits, validation or laboratory flags if they are available.
67	2.1	2-1	Comments on the DQO development will be submitted with comments on the RI/FS Work Plan. The assumption that previous data is usable is not interpreted as previous data is "sufficient" nor is it assumed that previous data is not "qualified"	Comment noted. We will clarify the context in the DQO section.
68	Table 2-1	2-2	General: Where the analytical data is for purpose of refining knowledge of existing plumes, the required PQL should be well location-specific as measurement of the leading edge of a plume would require a substantially lower detection level than at the center of mass.	The objective of the WAG 10 OU 10-08 sitewide groundwater sampling will be to measure contaminant concentrations in groundwater samples collected from the INEEL for comparison with the USEPA-stated MCLs and for assessing cumulative risk thresholds. This is the basis for the

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
68 continued				requirement that laboratory analytical limits (PQLs) be at least ½ of the published MCLs. Information on possible lower level detection and tracking of the groundwater plumes from specific facilities is being sampled and reported by the WAG that is sampling for these facility specific plumes. WAG 10 OU 10-08 will remain in contact with the other corresponding WAGs so that WAG 10 OU 10-08 is informed about the location and concentration of any groundwater plumes originating from these facilities.
69	Table 2-1	2-2	Vinyl chloride should be added to list of VOC's	Comment noted. Vinyl chloride was not called out specifically on Table 2-1 in the FSP since it was not identified as a COC in any of the WAG-specific post-ROD sampling plans. However, vinyl chloride will be one of the constituents that will be reported for VOCs by the USEPA Method 8260-B analysis for all the groundwater samples collected for WAG 10 OU 10-08 under this FSP.
70	Table 2-1	2-2	Am & Pu should be speciated and added to list of analytes in the vicinity of the INTEC and RWMC facilities due to the historical database	In the current RI/FS Work Plan and FSP, no WAG 10 OU 10-08 sitewide groundwater sampling is planned for facility-specific areas. The only sampling currently planned will be from the boundary, guard and baseline sampling wells identified in the Work Plan. Information on Am and Pu will be incorporated into WAG 10 through the use of information gathered from the WAG 3 and 7 sample results. Sampling of all of the WAG 10 sitewide wells including facility-specific wells is planned for groundwater sampling post-ROD. However, analytical results of groundwater sample analytical results from sampling events performed by WAGs 3 and 7 will be reviewed and incorporated into the database for WAG

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
70 continued				10 sitewide groundwater evaluations.
71	Table 2-1	2-2	The 4mrem/year MCL is for manmade beta/photon emitters only. The 4 mrem/year is not "effective dose equivalent", but is stated in the old-fashioned rad terms as 4 mrem/year to the whole body or any organ. (RP)	Comment incorporated as suggested.
72	Table 2-1	2-2	The list should include C-14 MCL = 2000 pCi/l), as it has been identified as a COC at the SDA, and can be done simply by LSC. (RP)	Comment incorporated as suggested.
73	Table 2-1	2-2	The uranium MCL (30 ug/l) is for uranium alone, not including "daughters". (RP)	Comment incorporated as suggested.
74	Table 2-1	2-2	Since there are a lot of gamma emitters, it may not be practical to set PQLs for all. A suggestion is using Cs-137 (MCL = 200 pCi/l) as a basis for setting the gamma spec. sensitivity requirements. (RP)	Comment incorporated as suggested.
75	Table 2-1	2-2	There is no separate MCL for gross beta, although there is a screening level of 50 pCi/liter which is exclusive of the naturally-occurring potassium-40 beta contribution. I don't see the usefulness of gross beta analysis here. (RP)	Comment noted. We have included gross beta to make our data comparable with data from other WAGs that have collected samples for gross beta analysis.
76	3	3-1	The priority for filling data gaps is confusing given the NCP's Groundwater Protection Strategy and the concern that the sole source aquifer be restored as a usable drinking water source. Groundwater beneath INEEL is not a sacrifice area.	Comment incorporated as suggested. We will revise the text as necessary so the priority for filling data gaps reflects the goal of compliance with MCLs and cumulative risk thresholds in the groundwater from INEEL-released contaminants whether on or offsite by 2095. Section 3.1 will also be revised to explain clearly how the

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 **REVIEWER:** EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
76 continued				Track 1 and 2 processes will be utilized to assess new sites that are to be evaluated under OU 10-08, which will emphasize that priority will be given to obtaining data necessary to identify and assess potential new sources of groundwater contamination, and any new source determined to pose a groundwater risk will be subject to full RI/FS analysis as prescribed under CERCLA.
77	5.1.1	5-1	Although it is stated that water elevations will be taken at each well before purging, this data needs to be combined with barometric pressure readings to be useful in refining regional groundwater flow	Comment incorporated as suggested. The text now states that as part of the field measurements collected during groundwater sampling, measurements of barometric pressure will also be collected.
78	Table 5-1	5-2	The location of the dedicated pump (if one is installed) should also be reported.	Comment incorporated as suggested. We have added the pump depth to the table.
79	FSP	5-2	Table 5-1: Many of the wells included in the list of proposed monitoring wells do not conform to generally acceptable design criteria for groundwater quality monitoring wells. Many of the wells are open to the formation for two hundred feet and more in fractured basalt flows. Well by water from different and segregated flow zones will result in groundwater samples that are a homogenization of the actual water qualities within the individual zones. (JR)	Accept. This question was discussed in detail during the DQO meetings between DOE and the agencies in February 2001. It was agreed at that time that the wells with large sections of open hole without specific screen intervals would be used for groundwater sampling since it would be cost prohibitive to try to retrofit these wells with specific screen interval. All new monitoring wells installed for WAG 10 sitewide groundwater monitoring purposes will be completed as RCRA-compliant wells with specific screen intervals. It is acknowledged that wells with large open hole intervals will result in homogenized samples when sampled by normal three well-volume purging techniques. One way to try to collect samples that are more representative of specific portions of the aquifer in these open hole wells will be

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
79 continued				through the use of low-flow groundwater sampling techniques. WAG 10, OU 10-08 plans on trying to implement this low-flow sampling technique for as many of the wells as possible.
80	FSP	5-2	Table 5-1: Wells that intersect multiple flow zones will have to be identified and analytical data collected that will determine the vertical gradient of contaminants within the wells. With the vertical as well as horizontal water quality information, individual plumes that overlap or commingle will be able to be identified at individual and/or multiple depths within the aquifer.	Accept: Using the low-flow groundwater sampling techniques indicated in item #79 above, samplers will try to sample for contaminants at specific depths in existing deeper wells. It is also planned that a series of deeper vertical profile sampling wells will be drilled and sampled at specific location downgradient from major plumes to evaluate the vertical extent of contamination and to sample for possible commingled plumes at depth.
81	FSP	5-5	Table 5-2: Given that some wells may be perched water wells, how will priorities be established if there is insufficient water to perform all analyses?	Reject: The primary purpose of WAG 10 OU 10-08 is the monitoring and sampling of the sitewide groundwater and not perched water zones. The perched zones are mainly the responsibility of the WAGs in which they exist. The exception to this basis for OU 10-08 would be a new site that included perched water that became the responsibility of WAG 10. In this case, multiple attempts over a 24 hour period after sampling would be made to collect sufficient sample volume to run all requested analysis. If insufficient volume could still not be collected, it would become a project call as to the priority order for analysis based on the main contaminants known at the site.
82**	FSP Section 9	9-1	Last Paragraph: This section states, "If a purge water disposal option is not available, then WAG 10 will not sample the well." This is an unacceptable statement. The management of IDW needs to be specified in this Plan to identify options	Comment incorporated as suggested. We have changed the paragraph to read, "....If a purge water disposal option is not available, then WAG 10 will make a reasonable effort to find a disposal option before sampling the well and/or to reduce

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
82 continued			for purge water management	generation of this waste. For example, if the opportunity exists for those sites that have specific purge water disposal restrictions, the groundwater monitoring and sampling team will sample concurrently with other programs or WAGs to eliminate duplication and to provide for the most efficient and compliant management of purge water by those programs."
83	FSP Section 10	10-1	General: This section needs to be expanded to identify the recommended minimum field QC samples are for critical samples	Accept: A table listing the frequency for the collection of QA/QC samples was inadvertently left out of the FSP and will be added back into the FSP.
84	10.1	10-1	This section states that the frequency of QA/QC sample collection is shown in Appendix B. The table in Appendix B does not clearly indicate the frequency of QA/QC sample collection as it appears that 22 samples will be collected with one duplicate sample. Please provide a table in the text that includes the full list of QA/QC samples that will be collected and the frequencies at which they will be collected. (AP)	Accept: A table listing the frequency for the collection of QA/QC samples was inadvertently left out of the FSP and will be added back into the FSP.
85	11	11-1	Please indicate in the text what Level A data validation will include. (AP)	Comment incorporated as suggested. The text now includes the following: "Level A data validation is a thorough process that evaluates subcontractor conformance to both contractual and technical criteria and is documented with a limitations and validation (L&V) report. The L&V report consists of data confirmation and data reduction, data clarification, and data appraisal. Data confirmation is the process of correlating the reported data within a given data package to its corresponding raw data. When applicable, this correlation also includes data reduction. Data reduction is the process of transforming raw

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
85 continued				data into reported data. This process includes the implementation of all applicable unit conversion calculations and data adjustment from techniques employed to dilute or concentrate samples. Data clarification is the process of qualifying or flagging reported analytical results, based on strict adherence to the applicable validation procedure and/or justifiable professional judgment by the data validator. Data appraisal is the formulation of a comprehensive L&V report that documents the entire method data validation process. The L&V report is written by an analytical chemist or other technical expert performing data validation. The report documents any deficiencies in the data, identified during the method data validation. A separate L&V report is required for each data package that undergoes method data validation." In addition, as suggested, we will require the laboratory to provide a data package sufficient to perform Level A Validation on all analytical results if needed in the future.
86	FSP	A-5	Figure A-3: This figure shows the locations of the proposed Site Wide Groundwater Monitoring Well Network guard wells. There is no guard well location proposed for the area downgradient of the RWMC, however. this area has a high potential to contribute contaminants to groundwater and a suitable guard well location should be identified for monitoring. (JR)	Accept: It is acknowledged and was previously noted by the project that a potential data gap in the guard well coverage exists in the area downgradient from RWMC. Part of the process in the RI/FS work will be to confirm the location of well coverage data gaps such as this and plan for the installation of new monitoring wells at these locations to fill these data gaps. The plans and locations of these additional monitoring wells will be discussed with the regulators as these needs are identified.

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (DRAFT), DOE/ID-10902, Rev. 0, March 2002

DATE: July 16, 2002 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
87	FSP Appendix A		General: No new wells are identified. Suggested new wells locations should be depicted (RP)	Accept: It is acknowledged and was previously noted by the project that potential data gaps in the monitoring well coverage exists in a number of the groundwater monitoring locations throughout the INEEL. Part of the process in the RI/FS work will be to confirm the location of well coverage data gaps and plan for the installation of new monitoring wells at these locations to fill these data gaps. The plans and locations of these additional monitoring wells will be discussed with the regulators as these needs are identified.