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PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: ***Explanation of Significant Differences for the Record of Decision for the Test Area North Operable Unit 1-10 (Draft),*** DOE/ID-11050, Revision C, January 2003

DATE: 2/12/2003 **REVIEWER:** **DOE-ID**

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
SPECIFIC COMMENTS				
1	3.2	12	Changes to both the WRRTF and the TSF burn pits are addressed under section 3.2. Subdivide 3.2 into 3.2.1, WRRTF-01 Burn Pits and 3.2.2, TSF-03 Burn Pit.	Incorporated. Will add the following introductory paragraph under 3.2: "For the burn pits, this ESD identifies changes resulting from post-ROD characterization and evaluation that included further identification of contaminants and evaluation of risk to human health and the environment."
2	3.2 (3.2.1)	13	An ARAR should be added to address the need to provide additional soil cover for two of the four WRRTF-01 burn pits.	ARARs will be added citing 40 CFR 61.151(a) requiring a soil cover and 40 CFR 61.151(e) requiring institutional controls, in a new paragraph preceding Table 2.
3	3.2 (3.2.2)	13	Add Table 6-4 from the Burn Pits Sample Data Compilation and Risk Assessment Report to show the final risk-based remediation goals for TSF-03 using excavation and disposal.	Incorporated. Information from Table 6-4 from the report will be added to Section 3.2.2 as table 4 "Risk-based remediation goals for TSF-03 using excavation and disposal.
4	3.3	15	The remedy description in Table 5 does not accurately reflect the remedy in the ROD (Ref ROD Section 9.2.4, pg Part II, 9-22 and 9-23.). Also the remedy change description is not clear.	Table 5 was revised to accurately reflect the remedy in the ROD, including institutional controls. The remedy change description was revised to clearly state that volume of soil to be remediated is zero, and that no institutional controls are required.

INEEL
Idaho National Engineering & Environmental Laboratory

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5	3.1	11	The ARAR for short term storage was removed from the ESD. ARARs should be added for self-implementing and risk based disposal and to clarify PCB ARAR..	Section 3.1 modified. For the V-Tanks, this ESD identifies changes regarding the need for (1) additional characterization of soil contamination at the TSF-09/18 V-Tanks site, followed by remediation (if required) and (2) the clarification and addition of ARARs for the management and disposal of PCB remediation waste.
			ARAR for 40CFR 761.(b)(1) should be corrected to to 761.61(b). PCB ARARs should also be applicable to all PCB remediation waste.	Section 3. 1.2 modified The ARARs identified in the ROD generally remain in effect. A change has been made to clarify the ARARs for managing PCB remediation waste. The ROD identified 40 CFR 761 (b)(1), "Performance-Based Disposal"—which is an ARAR applicable to liquid PCB remediation waste—as being applicable only to the tank contents. More appropriately, this ARAR should have been identified as 40 CFR 761.61(b) "Performance-Based Disposal." In addition 40 CFR 761.61(a) "Self-implementing on-site cleanup and disposal of PCB Remediation waste" and 40 CFR 761.61(c) "Risk-based disposal approval" are being added as ARARs. This ESD clarifies that these three ARARs represent disposal options that are applicable to all PCB remediation waste, including the tank contents, sand filter, piping, and tank debris that will be removed and disposed of under the remedial action.

INEEL
Idaho National Engineering & Environmental Laboratory

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
1			The final document will require signature pages for the respective agencies. Pending the completion of the final and the determination as to who will sign in the respective agencies, the pages can be left blank for any intermediate drafts.	Incorporated. Signature pages will be added as follows. IDEQ - C. Stephen Allred, Director IDEQ and Orville D..Green, Administrator, Waste Management and Remediation Division. EPA - Michael F. Gearheard, Director Environmental Cleanup Office EPA DOE - Robert M. Stallman, Acting Assistant Manager Environmental Management, DOE
SPECIFIC COMMENTS				
2	Section 2.1.1, 2nd Paragraph	Page 2	For the TSF-09 description, include the common designation for the tanks of "V-1, -2, and –3". This will maintain consistency with the TSF-18 description, which refers to "V-9".	Incorporated.
3	Figures 2, 4, and 5	Pages 4, 7, and 8	Figures 2 and 5 show Buildings TAN-645 and –641 adjacent to each other in an east-west orientation. It is not clear in Figure 4 what buildings are being depicted in the WRRTF area. Please change to maintain consistency of presentation.	The buildings are shown at different scales as appropriate for each figure. No change.
4	Section 2.2.1	Page 6	Since this discussion is included in the "Contamination" section, indicate that Cs-137 is the COC associated with the soils surrounding the tanks.	Incorporated.

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
5	Section 2.2.2	Page 6	As in the preceding comment, this section omits reference to asbestos, which has been determined to be the COC for WRRTF Burn Pits II and IV. Based on the present write-up, one would be lead to believe that there is no COC associated with the WRRTF-01 Burn Pits. Also, insert "and" in the last sentence after "(DOE-ID 2003)".	Incorporated in section 3.2.1. ".Asbestos was not evaluated in the human health risk assessment, but is present at >1%, by volume, and is therefore a regulatory and health and safety concern. A decision was made by DOE and the Agencies to place a native soil cover over these soils to prevent future exposure to asbestos."
6	Section 2.2.3, 1st Paragraph	Page 9	Include a brief explanation (suggest "a common standard in use at the time by the agencies") as to the significance of the 1,000 mg/kg evaluation standard, and the fact that the standard is no longer cited and has been replaced by the RBCA methodology.	Incorporated. "Evaluation of sample results from the fuel leak site when the tanks and piping were removed from the area indicated the maximum total petroleum hydrocarbons (TPH) were above the 1,000 mg/kg evaluation standards. The 1,000 mg/kg TPH standard is no longer cited, and has been replaced by the risk-based action corrective levels (IDEQ, 1996)." Has been added section 3.3
7	Section 2.2.4	Page 9	In the last sentence of the paragraph, add after the "…low levels of mercury" the words "above risk levels remain…" The section as written leaves doubt as to whether there is anything to be concerned about after the 1994-removal action.	Incorporated
8	Section 3.1.1, 1st Paragraph	Page 11	We have always understood the purpose of the additional characterization or the V-tanks soil contamination area to be to further define the AOC, and identify and remove the Cs-137 contaminated soils above risk based levels found within the AOC. This should be done regardless of whether remediation equipment will be staged within the AOC in the future, and the association is not clear. The second and third paragraphs in this section appear to explain in a satisfactory manner what the intent and purpose of the AOC characterization will be without having to refer to "remediation equipment". Please revise, or explain the need to refer to the remediation equipment.	Incorporated. The words "where remediation equipment may be stated in the future" have been deleted. The characterization is both to determine the AOC for regulatory purposes, and to determine the extent of soil above the Cs-137 remediation goal of 23.3 pCi/g. This has been clarified in the text.

INEEL

Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
9	Section 3.2	Page 12	Please provide background for changing the COC from lead to asbestos for Burn Pits II and IV. This should include a temporal narrative describing when asbestos was determined to be a risk, and why.	Incorporated. The text has been clarified in Section 3.2.1.
10	Ibid	Page 13	For the TSF-03 Burn Pits, please explain when and why dioxins and furans were determined to be a risk, and the reason behind requiring excavation and disposal, rather than a native soil cover. As in the previous comment, additional specificity per this change in remedy should be included in this section, i.e., when was it determined that the dioxins and furans were present at risk based concentrations, and why do these levels necessitate excavation and disposal of the contaminated soils when the lead concentrations alone did not require this action.	This was addressed in changes to Section 3.2. Dioxins and furans are no longer drivers for removal of TSF-03 waste. Removal was chosen for economic reasons over an earthen cover.
11	Section 3.3, Table 3-5	Page 14	In the "COCs" row, to maintain consistency a suggestion would be for the Original Remedy column to state "TPH above 1,000 ppm", and for the Remedy Change column to state "Petroleum constituents per RBCA guidance"	Incorporated See table 5
12	Section 3.4, Table 3-6	Page 14	In the Post-ROD Study and Risk Assessment row, please reword the Original Remedy entry to indicate that WAG 10 is not being evaluated. Under Remedy Change, the transferal of the site from one WAG to another is not a remedy change. Please state that the remedy, if any, stays the same despite the change.	Incorporated. Will revise as follows: Original Remedy "Treatability study to evaluate plant update factors and rates (to be conducted by WAG 10) Revised risk analysis using site specific data Remedy Change "No change to remedy. Remedy actions will be conducted under WAG 10, OU 10-08."

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

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GENERAL COMMENTS				
1			It should be clearly stated in the ESD that the refinement in the risk assessment is not a fundamental change and that the detection of new contaminants and finding of low concentrations of dioxins, furans, and asbestos do not change the selected remedy. Further the refinement of lead sampling only changes the volume of the area to be capped and/or excavated.	Incorporated, this has been incorporated in several places in Section 3.2.
2			The cost implications of these changes should be estimated, particularly in regards to the TSF burn pits since that was one of the main criteria in the ROD for changing the selected remedy. These estimates should include whether costs are projected to increase or decrease and by how much.	Incorporated. The cost estimates of the change are included in 3.2.2 For the TSF-03 burn pit site, this ESD identifies the change in remedy from installation of a native soil cover to the contingent remedy of excavation and disposal. The basis for the remedy change is that the original remedy of a soil cover with long-term monitoring has been determined to be more costly than the contingent remedy of excavation and disposal. The cost for excavation and disposal ($0.5M) is estimated to be $1.6M less than a soil cover with long-term monitoring ($2.1M).
3			Signature pages are needed for the ESD. At a minimum, DOE and EPA need to sign off on ESDs. At EPA, this signature has been delegated down to the Office Director level. The page for EPA's signature should read: Michael F. Gearheard, Director Environmental Cleanup Office	Incorporated. Signature pages will be added as follows. IDEQ - C. Stephen Allred, Director IDEQ and Orville D. Green, Administrator, Waste Management Remediation Division EPA - Michael F. Gearheard, Director Environmental Cleanup Office EPA DOE - Robert M. Stallman, Acting Assistant Manager Environmental Management, DOE

INEEL

Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

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SPECIFIC COMMENTS				
1	2nd & 3rd Bullet	Page 1	Change the phrase "sampling and risk assessment" to "characterization and evaluation"	Incorporated.
2	Last bullet	Page 1	Depending on the outcome of the discussion regarding section 3.5, this bullet will need to be modified.	This bullet has been deleted. Section 3.5 has been deleted
3	Section 2.1.1	Page 2	It should be made clear in this section that this action is dealing with a tank system, for example begin the second paragraph with the phrase; "The TSF-09/18 tank system consists of . . . "	Incorporated. Will revise the first paragraph to read: "The two V-Tank sites (TSF-09 and TSF-18) have similar attributes and are located in the same area (see Figure 3). The two tank sites were evaluated together in the ROD (DOE-ID 1999) due to similarities. Because of these similarities, all of the tanks, the tank contents, and associated piping are being managed as one tank system.
4	Section 2.2.2	Page 6	The text should make it clear that the area of dioxin contamination is a subset of the area of lead contamination. This makes it clear that the presence of the dioxin does not change the risk assessment nor the selected remedy, i.e., does not cause a fundamental change.	Please see changes that have been made to section 3.2 on dioxins. In addition Section 1 states: Additional characterization and evaluation performed under the ROD have determined that the remedy should change from native soil cover to the contingent remedy of soil removal and disposal. The characterization and evaluation also determined that the dioxins and furans are detected, but are below cleanup levels established in EPA guidance. The dioxins and furans are collocated with the primary contaminant of concern (lead).

INEEL

Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

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5	Section 2.2.2	Page 6	More information on what was known at the time of the ROD and what is known now about the lead and dioxin/furan contamination at these sites must be included. This concern is applicable to discussion of other contaminants in other sections of the ESD. The ESD should state the following: The actual concentration found and what sort of approach was used to determine the exposure point concentrations. Maximum? 95% UCL? Average? The phrase "EPA's target risk levels" is meaningless. If a risk-based approach was used, the following should be stated; the risk level used, and the land use. Also, the exposure assumptions should be stated. If a comparison with a screening level was used (which is likely for lead), note the concentrations that were used for comparison and the basis for that value. In regards to the concentrations of dioxin and furans found in the burn pits, the maximum concentrations at which these compounds are found are just at the value that EPA policy mandates cleanup. The 95% UCL is well below this number of 1 ppb. Thus, these concentrations do not require removal for unrestricted use under EPA guidance.	Please see response to EPA comment 25 for discussion on dioxins and furans. Section 3.2.2 also was modified to discuss lead and dioxin concentrations. Post-ROD sampling indicates that lead contamination in the soil remains above the 400-mg/kg screening level. Only one of the 13 mixed soil zone samples exceeded the EPA Region 9 PRG of 400 mg/kg, but the lead exposure point concentration (95% upper confidence limit) of 1,354 mg/kg exceeds the EPA Region 9 PRG of 400 mg/kg. Confirmation sampling will be done after remediation to ensure that remedial goals have been met. The human health risk evaluation documented in the TSF-03 and WRRTF-01 Burn Pits 2000/2001 Sample Data Compilation and Risk Assessment Report for Operable Unit 1-10, Waste Area Group 1, at Test Area North (DOE-ID 2003) documented the presence of dioxins and furans in TSF-03 soils. These dioxins and furans contribute significantly to the residential exposure scenario. The EPA Office of Solid Waste and Emergency Response (OSWER) has issued guidance (OSWER 1998) establishing 1 ppb toxic equivalent (TEQ) as the recommended cleanup level for dioxins and furans for residential exposure scenarios. The mean exposure concentration (95% upper confidence limit) at TSF-03 is 0.5 ppb TEQ or approximately half the recommended cleanup level. Only one of 13 mixed zone soil samples exceeded the recommended cleanup level. The dioxins and furans will be removed concurrently with the lead during excavation of the TSF-03 area.

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			Remedy selection and clean up levels for dioxins and furans are issues of national importance to EPA and frequently require the region to consult with Headquarters prior to selecting or concurring in any soil clean up level for dioxin and furans. Without the additional information requested at the beginning of this comment, Region 10 cannot determine if this is a situation, which requires consulting with EPA Headquarters.	A summary of the changes for the TSF-03 burn pit is shown in Table 3. The risk-based remedial goals for TSF-03 (DOE-ID 2003) are given in Table 4.
6	Section 2.2.3, 2nd paragraph	Page 9	This paragraph should make it clear that the "subsequent RBCA analysis" was part of the remedy required by the ROD and that this was done in compliance with the Idaho regulation/ARAR for underground storage tank remediation. (In other words, this analysis was anticipated by the ROD - it wasn't something that came out of left field post-ROD. Otherwise this represents a fundamental remedy change.) Also, rewrite the last sentence in this section to read " . . . at the fuel leak site did not pose an unacceptable risk . . . "	Incorporated into Section 3.3. Section 2 discuses the ROD, and not the data and evaluations that followed The following has been added to Section 3.3 "For the WRRTF-13 fuel leak site, this ESD documents the change to no action at this site based on the post-ROD evaluation of new data against the IDEQ Risk Based Cleanup Action levels. The evaluation was performed as specified in the ROD (DOE-ID 1999) and documented in the *WRRTF-13 Calendar Year 2000 Sampling and Risk Based Corrective Action Analysis Summary Report* (INEEL 2002a). No soil volume exceeded the action levels; therefore, this becomes a no action site. The evaluation of new data and subsequent RBCA analysis based upon a residential scenario is consistent with the ROD and has resulted in the determination that neither remedial actions nor institutional controls are required. The site was assumed to require action when the ROD was signed. A summary of the changes for the WRRTF-13 fuel leak site is shown in Table5. Evaluation of sample results from the fuel leak site when the tanks and piping were removed from the area indicated the maximum TPHs were above the 1,000-mg/kg evaluation standard. The 1,000-mg/kg TPH standard is no longer cited and has been replaced by the RBCA levels (IDEQ 1996)."

INEEL

Idaho National Engineering & Environmental Laboratory

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7	Section 2.3.4	Page 11	Revise the second sentence to read, " . . . conducted to evaluate **INEEL specific** plant uptake factors . . . "	Incorporated.
8	Section 3.1	Page 11	Revise this sentence to read " . . . and the additional investigation of the soil contamination from the . . . "	Incorporated
9	Section 3.1.1	Page 11	In this section, it is unclear if the purpose of the characterization is to have a better idea of what will eventually have to be remediated, or if the purpose is only to define what is the AOC (e.g., for regulatory purposes?) The first reason makes sense. If this is the case, change the title of this section to "Additional Characterization of the Soil." If this is the reason, why is the AOC such a focus? If the AOC is the focus of this section, it should be defined. The definition to use for AOC is "the AOC is the areal extent of contamination."	The purpose of the sampling is twofold, to identify and characterize the soil to be remediated, and to further define the AOC.
10	Section 3.1.1, 2nd paragraph, last sentence	Page 11	It is not clear what is meant by the term "risk assessment values." Is this a discussion about the need for action, about risk-based cleanup levels, or what?	Incorporated. The term "risk assessment values" has been eliminated and the paragraph has been re-written for clarification.

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11	Section 3.1.1, last paragraph	Page 11	This paragraph states that any area that exceeds a cumulative risk of 1E-4 will be remediated. Does this represent a summary of the ROD, or is this a new/revised cleanup standard? The ROD states that the remediation goal is all contaminated soil above 23.3 pCi/g Cs 137. Does the 1E-4 cleanup goal represent a different cleanup standard than 23.3 pCi/g Cs 137? If so, this is a significant change that is not highlighted as a change. (The ROD also mentions Co 60 contamination but this section does not discuss a cleanup level for Co 60 nor an explanation of why there is no clean up level for Co 60.) Second, any mention of a risk-based cleanup must be accompanied by what land use this risk calculation is to be based on, and some reference to what exposure assumptions will be used. This ESD does not provide this information.	The first sentence of this paragraph has been re-worded to read: "As part of the final remedial action, any area that exceeds the remediation goal of 23.3 PCi/g for Cs-137 will be remediated by removing the contaminated soil."

INEEL
Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

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12	Section 3.1.2, bullet	Page 12	This bullet appears to state that 40 CFR 761.61 was identified as an ARAR for the tank waste only. This is incorrect. The ROD cited 40 CFR 761.61 (b)(1), which are the performance-based disposal requirements for liquid wastes - and thus would never be an ARAR for anything other than liquid wastes. What ARAR are you trying to add and for what media? Also, Appendix A cites several additional TSCA sections as ARARs. The purpose for adding these regulations is not clear. Additional text should be added to clarify why these regulations are being added. Why change these ARARs now instead of including them in the upcoming ROD amendment?	The text has been changed for clarification, and appendix A has been deleted.. The PCB remediation waste regulation is added to address any such waste encountered during the early remedial action. Change is necessary now to address sand filter. ***Additional ARARs*** The ARARs identified in the ROD generally remain in effect. A change has been made to clarify the ARARs for managing PCB remediation waste. The ROD identified 40 CFR 761 (b)(1), "Performance-Based Disposal"—which is an ARAR applicable to liquid PCB remediation waste—as being applicable only to the tank contents. More appropriately, this ARAR should have been identified as 40 CFR 761.61(b) "Performance-Based Disposal." In addition 40 CFR 761.61(a) "Self-implementing on-site cleanup and disposal of PCB Remediation waste" and 40 CFR 761.61(c) "Risk-based disposal approval" are being added as ARARs. This ESD clarifies that these three ARARs represent disposal options that are applicable to all PCB remediation waste, including the tank contents, sand filter, piping, and tank debris that will be removed and disposed of under the remedial action.

INEEL

PROJECT DOCUMENT REVIEW RECORD

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13	Section 3.2 and Tables 3-2 and 3-3	Page 12 and 13	See comments above regarding Page 6, Section 2.2.2. Also, additional explanation should include a discussion of the status of Pit III and why it does not need a soil cover. An explanation of why the monitoring and maintenance are not needed should be included in this section.	Incorporated in section 3.2.1, Pits I and III are no action sites. Lead has been confirmed below the PRG value, asbestos was not identified as being present, and the residential risk scenario evaluation demonstrated acceptable risk. Neither remedial actions nor institutional controls are required for Pits I and III.
14		Pages 12 and 13	NESHAPs or state solid waste regulations should be cited as ARARs to address the response action for the asbestos at the WRRTF burn pits.	Incorporated in 3.2.1.1 *The ARARs identified in the ROD remain in effect (DOE-ID 1999). In addition, 40 CFR 61.151(a) requiring a soil cover and 40 CFR 61.151(e) requiring institutional controls have been added for WRRTF Burn Pits II and IV due to the confirmed presence of asbestos.*

INEEL

PROJECT DOCUMENT REVIEW RECORD

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15	Section 3.2, 1st paragraph	Page 13	The issue for changing the remedy that has been raised in earlier discussions was that it was less expensive to remove the soil than cap the burn pits given the cost of long term O&M at this site. If this remains DOE's position, the following language should replace the first paragraph on Page 13. "Post ROD sampling indicates that lead contamination in the soil remains above the screening level of 400 ppm. A more detailed cost analysis comparing the construction and maintenance of a soil cap versus excavation and removal of the soil to the ICDF indicate that removal is more cost effective. The extent of excavation will be determined by field screening for lead. The dioxins and furans found at this site are spatially associated with the lead. Thus, by removing the lead to the action level the dioxins and furans will be removed as well. Confirmation sampling will be collected and analyzed at an off site laboratory after excavation is complete to insure that screening levels are met."	Incorporated. The text in 3.2.2 has been changed to: Post-ROD sampling indicates that lead contamination in the soil remains above the 400-mg/kg screening level. Only one of the 13 mixed soil zone samples exceeded the EPA Region 9 PRG of 400 mg/kg, but the lead exposure point concentration (95% upper confidence limit) of 1,354 mg/kg exceeds the EPA Region 9 PRG of 400 mg/kg. Confirmation sampling will be done after remediation to ensure that remedial goals have been met.
16	TSF-03 burn pit and Table 3-3	Page 13	More details should be provided in this section to address the cleanup of dioxins and furans such as clean up level, where is the excavated material will be disposed and if the excavated material is a hazardous waste.	ICDF has been specified as disposal facility in Table 3. Dioxins and furans have been removed as drivers. See resolution to EPA comment 25.

INEEL

Idaho National Engineering & Environmental Laboratory

PROJECT DOCUMENT REVIEW RECORD

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17	Section 3.4	Page 14	This section is confusing. Providing some additional text as to why this site was proposed to be transferred to WAG 10 and back to WAG 1 would help clarify it.	Incorporated. Section 3.4 now says Transfer of the TSF-08 mercury spill area to WAG 10 is based on Agency agreement that this site should be included under the OU 10-08 Remedial Investigation/Feasibility Study and future ROD. The WAG 1, OU 1-10 remediation will be complete before a decision is made for this site. Under this change, the new plan eliminates unnecessary coordination between WAGs by providing for the further evaluation, remedy decision, and remediation (if required) to all be addressed under the same ROD. The remedy, if required, would be the same regardless of which WAG the remediation is performed under. A summary of the changes for the TSF-08 mercury spill area is given in Table 6.
18	Section 3.5	Page 14	The text in this section should be removed and replaced with the following language "Components of the selected remedy identified in the OU 1-10 ROD and in this ESD include the excavation and disposal of waste during remediation activities. Such waste will be generated and stored within the areal extent of contamination and all suitable areas in very close proximity to the contamination necessary for implementation of the response action in compliance with CERCLA Section 121(e). Waste will be subsequently moved for storage, treatment or disposal at waste management units located at INEEL or elsewhere. The Remedial Design/Remedial Action Work Plans will specify where waste will be transferred for storage, treatment or disposal, and how the waste meets acceptance criteria of the receiving unit. DOE will comply with the requirements of the Off Site Rule, CERCLA Section 121(d)(3), as applicable."	Section 3.5 has been deleted

INEEL
Idaho National Engineering & Environmental Laboratory

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19	Section 5	Page 15	The text should document that 300.435(c)(2)(i) requirements are met and should clarify that there will be no formal comment period.	Incorporated.
20	Table A-1, 1st item		This section of the PCB regulations allows storage of radioactive PCBs for **more than** one year which probably the point of citing this regulation. Correct?	Appendix A has been deleted.
21	Table A-1, 5th item.		This appears to cite the general introductory paragraph of 40 CFR 761.61 as an ARAR to both the tank contents and the other wastes. This is very different from what is stated on page 12 of the ESD. Is this the intent of this item?	Appendix A has been deleted.
22	Second bullet	Page 1	There is a typo in this bullet, **two** of the WRRTF burn pits have been determined to require no action, not one.	Typo has been corrected.
23	3.5		Sect. 3.5 is being removed and the detailed discussion will appear in the ROD amendment, correct? If so, on page 2 the last bullet should be removed.	Bullet has been removed
24	3.2.1 3.3		For all sites that are going from an action remedy to a no-action remedy, please make sure the ESD states whether or not this decision is based on an assumption of unlimited use and exposure, or whether it is based on some limitation on future use or exposure and thus needs an institutional control. See, for example, the WRRTF Burn Pits and Table 3-2.	Accepted. Text has been modified for WRRTF-01 pits I and III and WRRTF 13 such that it documents that the change to the remedy was based upon the residential scenario and that no institutional controls are necessary.

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PROJECT DOCUMENT REVIEW RECORD

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DATE: February 12, 2003 **REVIEWER:** **Environmental Protection Agency**

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
25	3.2.2		If this table and ESD continues to have a clean up level of .4 ppb for 2,3,7,8, TCDD TEQ, the Region have to consult with Headquarters before we can sign this ESD. The Region has started that consultation. However, this would add this site to EPA's national list of dioxin sites. An alternative would be to either use the language we forwarded earlier, or to select a clean up level of 1 ppb, say the site already meets this level, and add that the clean up will achieve a lower level of dioxin (estimated to be around .4 ppb) because the dioxin is co-located with the lead.	Accepted. TEQ has been removed as a driver for remediation of the TSF-03. TEQ risk reduction is now discussed as a benefit of lead removal. See section 1, section 3.2.2, table 3, and table 4. The cost savings in moving from soil cover to extraction are now the prime reason for the remedy change for TSF-03. "The human health risk evaluation documented in the *TSF-03 and WRRTF-01 Burn Pits 2000/2001 Sample Data Compilation and Risk Assessment Report for Operable Unit 1-10, Waste Area Group 1, at Test Area North* (DOE-ID 2003) documented the presence of dioxins and furans in TSF-03 soils. These dioxins and furans contribute significantly to the residential exposure scenario. The EPA Office of Solid Waste and Emergency Response (OSWER) has issued guidance (OSWER 1998) establishing 1 ppb toxic equivalent (TEQ) as the recommended cleanup level for dioxins and furans for residential exposure scenarios. The mean exposure concentration (95% upper confidence limit) at TSF-03 is 0.5 ppb TEQ or approximately half the recommended cleanup level. Only one of 13 mixed zone soil samples exceeded the recommended cleanup level. The dioxins and furans will be removed concurrently with the lead during excavation of the TSF-03 area. A summary of the changes for the TSF-03 burn pit is shown in Table 3. The risk-based remedial goals for TSF-03 (DOE-ID 2003) are given in Table 4."

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26	3.1.1		Section 3.1.1., second paragraph (last sentence) and third paragraph. It appears the wrong terms are used here in regards to future remedial decisions, which is one reason EPA reviewers find this section confusing. The term "final remedial action" or "final remedial goals" are to be used when talking about a future ROD at a site that only has an interim action ROD. However, the ROD for this site was a final ROD, not an interim action ROD. Therefore, much more accurate phrases would be "the remedial action and remedial goals as will be changed in the ROD amendment" or other phrases along those lines.	Accepted. Text has been modified in several sections to replace phrases such as "final remedial action" and "final remedial goals" with "remedial action" and "remedial goals".
27	3.1.1		Section 3.1.1., third paragraph. This paragraph is confusing regarding what is or is not being changed in this ESD. The last sentence of this paragraph implies that this paragraph is a change, whereas the table seems to indicate that it is not a change. Perhaps what is needed is to move the last sentence into a separate paragraph, and to clarify that the rest of this discussion in the third paragraph is unchanged from the ROD - if that is correct.	Partially accepted. The text has been modified to clarify the extent of the change.
28	3.2.1		Section 3.2.1 should discuss the difference in cost between placing an native soil cover over two vs. three pits.	Jim Bruce to provide sentence.
29	3.1.2	12	1st parg. The last part of this paragraph needs to be rewritten. It is not clear how changing the contaminant from lead to asbestos results in ". . . maintaining the need for a native soil cover . . ."	Accepted - rewritten
30	3.1.2	12	2nd parag. In the second sentence add text that notes how much the area requiring capping is reduced since Pit I does not now need a cap. Include the cost of the re-engineered cap for pits II and IV at the end of the third sentence.	Cost now included in paragraph.

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31	3.1.2	12	last parag. EPA recommends rewriting the 1st sentence to read ". . . risk scenario evaluation allows for unrestricted use."	Suggested language incorporated into test in 3.1.2
32	Table 2	13	1st row, 2nd column. Is lead a COC for all four pits, or just 3, or should the label of the row be COPCs?	Just 3, language corrected.
33	3.2.2	13	2nd parg., last sentence. EPA recommends rewriting the sentence to read; "However, the dioxins . . ."	Suggestion accepted. Language changed.
34		13	3rd parg. It is not clear how the 95 UCL can be 1,354 mg/kg, if only 1 sample exceeded the PRG of 400 mg/kg. Is this sentence correct or is some text missing.	Track 2 sampling measured the lead exposure point concentration at 2464 mg/kg (95% UCL). Post-ROD sampling confirmed that the lead exposure point concentration (1354 mg/kg) was above the EPA Region 9 residential PRG of 400 mg/kg. Confirmation sampling will be done after remediation to ensure that remedial goals have been met.
35	Table 5		3rd row, 3rd column. EPA recommends rewriting this block to read; ". . . remediated is zero. This is a no action site."	Accepted, wording changed to include suggestions.
36	3.2		Why use the phrase "the original Track 2" are there other Track 2s? Recommend dropping the word original.	The word original has been removed from text in reference to Track 2 sampling. In addition in Section 6, the word original has been replaced in reference to the ROD.

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37	3.2.1		Rewrite the third paragraph to read: The Track 2 investigation did not identify asbestos in pit I and lead was not identified above EPA Region 9 residential PRG during the post ROD characterization. Based on this information, Pit I does not require a native soil cover and there are no restrictions on the use of this area. The remedy stated in the ROD for this area was capping. This remedy is changed to no action. The remedy for Pit III remains the same as stated in the ROD, no action. The Track 2 investigation did not identify asbestos as being present in Pit III and lead concentrations are below the EPA Region 9 residential PRG for lead. Thus the site is available for unrestricted use. No action is required for Pit III.	Suggested language incorporated.

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38	3.2.2		2nd parg. does not make sense. Numerous samples results used in the RI/FS were greater than 400 mg/kg. So the second sentence is not correct unless one is referencing the Post ROD sample results only. It is not clear why one would be interested in only the post ROD sampling results and not both post and pre ROD sampling results. Even it this so, only reporting the post ROD sampling, I think the statement on only 1 of 13 samples exceeding 400 is not correct. I would recommend striking that sentence. The paragraph would read: "Post-ROD sampling indicates that lead contamination in the soil remains above the 400-mg/kg screening level. The lead exposure point concentration (95% upper confidence limit) is 1,354 mg/kg.. Confirmation sampling will be done after remediation to ensure that remedial goals have been met."	Sentence on 1 of 13 removed. Exposure point concentration will be expressed for both Track 2 and Post-ROD sampling events.