Appendix P

Responses to Comments

File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: RAWP, DOE-ID-10984				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
1.	Section 1.4.2, 3rd bullet	1-10	The last sentence in this paragraph states, "The verification sampling will be performed independent of the organization generating and characterizing the waste. This appears inconsistent with Section 2.1.2, Page 2-1, where it states, "The ICDF personnel will supervise the collection of the verification samples(s)...". Please clarify the role of the ICDF personnel as either independent of, or supervising the generator in the collection of the verification samples. (JR)	The text in Section 1.4.2 (and possibly other sections) will be modified to agree with other parts of the document. The ICDF personnel will direct the generator in collection of samples used for verification of the Material Profile.
2.	Section 4.1.6	4-5	What happens to a waste stream that has the data inventoried in accordance with the criteria established in this section, but some portion of the data does not add to, or correlate with, another method of waste measurement? Is the inventory tracking independently responsive to provide an alarm notice to the system operator when not all of the inventoried waste has been delivered to the ICDF? Please provide a written statement describing the IWTS capabilities concerning the above questions as demonstrated during the Comment Resolution Meeting October 21-25, 2002. (RH and AE)	Personnel entering data into IWTS will make the necessary conversions so all units are the same. For the third question, IWTS does not provide an alarm notice when not all of the inventoried waste has been delivered to the ICDF. Only container profiles that are part of an executed shipment task are checked upon receipt. For example, site TSF-26 has 50 containers of soil in storage at TAN. The TAN waste specialist includes 40 containers in a shipment task to the ICDF Complex. ICDF Complex personnel (as part of receipt inspection) verify the 40 containers are received at the ICDF Complex (with the correct individual container barcodes), but are not concerned with the remaining 10 containers that remain at TAN and were not included in the shipment task. IWTS has nearly limitless capabilities for tracking and reporting, but this feature is not necessary for the operation of the ICDF Complex. The waste specialist at the other facility (e.g., TAN) is

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DOCUMENT TITLE: RAWP, DOE-ID-10984				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				responsible for management of containers of waste at the other facility.
3.	Section 2.1.1, 2nd para.	2-1	This paragraph states that "Once a waste stream has been identified as CERCLA..." but does not include any particulars on who will make the determination that a certain waste is, in fact, a CERCLA generated waste stream. Please include additional details of who will determine whether a particular waste is, or is not, a CERCLA waste and also discuss what documentation will be provided to ICDF personnel to certify that a proposed shipment to the ICDF is a CERCLA waste. (JR)	The requested clarification would provide information that is readily known by personnel (INEEL contractor, DOE, EPA, IDEQ) involved with the INEEL's Environmental Restoration Program (under the FFA/CO) and does not provide added benefit to the document. However, in general, a CERCLA waste would be a waste associated with a CERCLA site identification number (e.g., CPP-92). CERCLA site identification numbers were initially assigned in the FFA/CO; new CERCLA site identification numbers are assigned to new sites by the new site inclusion process (written form completed by DOE, EPA, and IDEQ). No text change.

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DOCUMENT TITLE: RAWP, DOE-ID-10984				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
4.	Section 2.1.3, 2nd para.	2-2	According to this section of the text "...the waste will be returned to the generator, assuming the shipment back to the generator would not violate DOT regulations." Assuming the waste met DOT regulations when it was sent to the ICDF, please discuss in the text how the same waste will not meet DOT regulations if, in the event of some discrepancy in the Onsite Waste Tracking Form, the shipment must be returned to the generator. (JR)	The intent of this phrase is to cover the contingency that some waste streams were not properly identified or were in an improper container and should not have been shipped, for example, leaking waste, free liquids, damage in transit. It is not the intent to not meet compliance with DOT regulations; however, a contingency plan is deemed necessary. No text change.
5.	Section 3.2, 1st para.	3-3	The following statement appears in this paragraph of the text. "To establish background contaminant concentrations, four samples have been collected from the SRPA monitoring wells for analysis prior to the completion of the startup of the ICDF Complex operations in June 2003." The text should be amended to state that four rounds of sampling, not "four samples", have been collected. (JR)	The text will be modified as suggested.
6.	Section 4.2.1	4-6	According to the text, the ICDF Complex user may apply either acceptable process knowledge or use analytical data to characterize the waste. The text should be revised to state that either or a combination of both of these methods, rather than either one or the other, is acceptable. The use of process knowledge, bolstered by analytical results may be required to provide a high degree of confidence in the waste characterization. (JR)	The sentence will be revised to, "The ICDF Complex user may apply either acceptable process knowledge, use analytical data, or combination of both these methods to characterize the waste as outlined in the ICDF Complex WAC."

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: RAWP, DOE-ID-10984				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
7.	Section 4.4.4, 2nd para.	4-11	In addition to leachability there is also a requirement for 50-psi compressive strength that needs to be addressed.	50 psi is a WAC requirement. The mock-up demonstration of the stabilization will be used to demonstrate that the treated waste form will have a compressive strength greater than 50 psi. This information will be added to the document.
8.	Section 4.6.1, 1st para.	4-15	This section of the text discusses the potential for using aqueous waste that does not meet the ICDF evaporation pond WAC in the treatment process or disposing of the waste off site." The text should include a statement that contaminants present in the makeup water used for waste stabilization will be accounted for in the ICDF inventory to insure that the WAC for individual contaminants is not exceeded. (JR)	At the end of the first paragraph in Section 4.6.1, a new sentence will be added that states, "Contaminants present in any aqueous waste used for treatment will be accounted for using the IWTS to ensure that operational limits are not exceeded."
9.	Section 5.1.3, 1st para.	5-7	There should be a discussion on the shakedown period between construction complete and determination that the remedy is operational and functional. A completed final inspection should mark the closure of the shakedown period.	The first paragraph in Section 5.1.3 will be modified to include this concept. The revised paragraph will state: "The ICDF Complex final inspection is conducted following a period of operations following startup; this period is known as the shakedown period. The final inspection, conducted by the Agency project managers, confirms the resolution of all outstanding items identified in the prefinal inspection, marks the closure of the shakedown period, and verifies that the ICDF Complex has been constructed and is operating in accordance with the requirements of the ROD (DOE-ID 1999), the Corrective Action Plan developed from the prefinal inspection, and the RAWP."

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DOCUMENT TITLE: RAWP, DOE-ID-10984				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
10.	Table 5.2	5-8	Under "ICDF Complex access and haul roads" Inspection frequency column, insert the word "each" between the words "Following" and "significant" for consistency.	Comment will be incorporated as suggested.
11.	Table 5.2	5-10	** Under Tank Inspection, the applicable substantive citation is 264.195(b).	Comment will be incorporated.
12.	Section 9.1	9-1	Referencing 262.34(a) implies compliance with 265 substantive requirements. A citation to 264 requirements is needed to avoid the accumulation time issues.	Language will be added that although 262.34 references 265 regulations, because this is a CERCLA site and 265 references are not ARARs, the applicable 264 regulations will apply.
13.	Table 10-1	10-1	** A specific deadline date is required for the submittal of the draft RA Report, which is based on a critical path schedule. Deviations from the critical path schedule beyond DOE's control is a 'good cause' basis for extension.	Table 10-1 will be modified to include a date for submittal of the draft RA Report, which will be 60 days from the Final Inspection. The date will be identified as September 30, 2004, and correspond to the final inspection being approximately one year following beginning of landfill operations. If the RA Report date needs to be adjusted based upon waste treatment, the new date will be included in the revised RAWP that includes the waste treatment operations.

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File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
14.	Section 1, last para.	1-1	** The correct citation for determining if placement is triggered at a CERCLA site can be found in OSWER Directive 9347.5-O5FS, July 1989, Superfund LDR Guide #5.	Citation will be corrected.
15.	Section 1, 4th para.	1-4	** Care needs to be taken against possible misinterpretation of the term as the EPA fact sheet refers to an O&M Plan and an O&M Manual, which is considered the O&M Plan under the FFA/CO.	Comment noted.
16.	Section 1.1	1-5	Should there be a discussion on shakedown and an "operational & functional" determination?	See response to Comment #9.
17.	Section 1.2.10	1-16	** The discussion should identify that perched water (if present) will also be monitored.	The text will be modified to indicate that perched water, if present, will be monitored for water quality. However, the decisions as to how to statistically evaluate perched water data and whether perched water will be part of the detection monitoring network have not been made. Agency discussions and consensus are scheduled for May following receipt of validated data from four rounds of baseline sampling.
18.	Fig 1-8	1-19	When verification sampling occurs in the process should be included.	The text will be modified to explain that sampling in support of verification will occur prior to shipment of the waste to the landfill.

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File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
19.	Section 1.3.1, #10	1-21	10a & 10b are duplicates?	Text for item 10b will be revised to say, "Compaction of soil waste surrounding the noncompactible and containerized materials will be verified by the use of a nuclear density field gauge. See Chapter 4 and Appendix A of this O&M Plan for further details."
20.	Section 1.3.1, #12	1-21	What is the difference between the next "business day" and the next "operating day?"	Reference to business day has been deleted.
21.	Section 2.3	2-5	** A listing of minimum training per job responsibility is required and not provided.	Section 2.3, Appendix A, will identify that the Health and Safety Plan (HASP) lists the minimum training requirements per position. At Table 6-1 of the HASP, it will subdivide the training courses into the following types of categories and identify the courses required under each topic: • General Employee Training (procedures & policies) • ICDF Operations (RD/RAWP, O&M Plan, O&M Manual, BMPs, equipment procedure training, etc) • Radiation, Chemical and Industrial Safety and Protection, Emergency Preparedness, ICDF Hazard Communication, Security & Fire Protection. The minimum frequency of training required, e.g., "1" for once only, 1/yr, 1/5yr, "c" for continuous, will be identified.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
22.	Section 3.1, 5th bullet	3-4	Is the 500ppm VO exclusion consistent with the requirement at 40 CFR 264.1082(c)(1), which addresses the average at point of waste origin of all hazardous waste entering the unit?	Yes. No text change.
23.	Section 3.5	3-13	The specific requirements to prevent exposure of ICDF Complex visitors <15 mrem/yr needs to be described here.	See response to EPA Comment #73.
24.	Section 3.9.2, 2nd para.	3-36	This portion of the text discusses the Snake River Plain (SRPA) groundwater monitoring wells and states "Six SRPA wells will be monitored in the vicinity of the ICDF Complex, including one existing upgradient monitoring well and five new monitoring wells that were installed south of the ICDF Complex." The last sentence in the second paragraph states "Six new perched water wells will be installed at the locations shown in the Groundwater Monitoring Plan." The text should reflect the fact these wells have also been installed and initial groundwater samples collected from the shallow perched zone in addition to those from the SRPA wells.(JR)	Accept. Text will be modified.
25.	Section 3.9.2, 2nd para.	3-36	The text should state that the perched aquifer wells will be checked for the presence of groundwater at the same frequency that the SRPA wells are sampled. In addition, the text should state that perched groundwater samples shall be collected from any or all of the perched aquifer monitoring wells at the same intervals as the SRPA wells whenever there is sufficient groundwater present in the perched water wells. Although there will be periods when no water is present in the perched groundwater wells, these	Text will be modified to "Water levels will be checked in the perched water wells during routine monitoring of the SRPA wells. If sufficient water is available, samples will be collected in accordance with the Groundwater Monitoring Plan (DOE/ID-10955)."

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
			wells are an important part of the ICDF groundwater monitoring network. The perched groundwater wells should be checked for the absence or presence of water on a regular basis coinciding with the SRPA well monitoring.. (JR)	
26.	Section 4.1.2, 1st para.	4-1	** It states, "The ICDF complex user may use either acceptable knowledge or sampling analysis to characterize the waste." This statement implies an either or approach which does not consider that in many cases "acceptable knowledge" may require some degree of analytical data to adequately characterize the waste stream. (JR)	A complete discussion of acceptable knowledge, including analytical characterization, is in Section 2.4 of DOE/ID-10881. Prior to waste entering the ICDF Complex, this document will have to be consulted.
27.	Section 4.1.2, 1st para.	4-1	The first sentence states that waste characterization is the responsibility of the ICDF Complex user and according to the concluding sentence in this paragraph "... documentation must be provided to demonstrate that the waste information is sufficient to accurately and completely characterize the waste stream." Please specify who will review the ICDF user documentation and determine that the user has provided sufficient information of sufficient quality to accurately and completely characterize the waste stream. (JR)	The ICDF Complex waste specialist will confirm this documentation as discussed in Section 2.2. No text change.
28.	Section 4.3.3	4-9	Can a sustained wind of 35mph without precipitation invoke an inspection?	Yes, it could. Wind-type weather events without precipitation are expected. No change to document.
29.	Section 4.4.2	4-14	How the location of the grab sample will be selected is needed here.	This will be addressed in the revised RAWP once the revision to the SSSTF RD/CWP has been completed.

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File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
30.	Section 4.11.13	4-27	No justification is provided for limiting the warning signs to English only. Please provide a statement that no foreign-born minority groups represent more than one percent of the local population and therefore signage will be limited to English only. (RH)	The appropriate ARAR, 40 CFR 264.14, does not include a "1%" criterion. However according to the Idaho's April 2000 Census by race, there are 2,899 residents of the county. There are 120 residents of Hispanic descent. DOE does not consider that Spanish is a "predominant" language within the boundaries of the INEEL. Therefore, there is no reason for signage to be in any other language. No text change.
31.	Section 5.1	5-1	Pursuant to 40 CFR 264.554(a), staging piles are limited to solid, non-flowing wastes. Why are the tanks included in this discussion?	Section 5.1 describes Staging and Storage Areas and is not just limited to staging piles. No text change.
32.	Section 5.1.3	5-6	Requesting an extension through what amounts to a regulatory administrative procedure, which would require an ESD, is not appropriate. The unit should be managed as a storage unit for wastes remaining >2 years.	DOE agrees with this position; however, IDEQ requested that this language be added to the document. No text change.
33.	Section 7.4	7-2	** There needs to be a discussion distinguishing changes which affect the FFA/CO primary documents.	Language will be added that says "If the changes require a change to a primary FFA/CO document, a DAR will be completed and sent to the Agencies for approval."
34.	Section 8	8-1	There should be a reference to Appendix A as these are minimum requirements, not just procedures.	A reference to Appendix A is in the last sentence in Section 8.1. Language will be added that states these are minimum requirements.
35.	Section 9.1.2	9-2	If an ongoing tank leak is detected, the need to transfer the tank contents is also a possibility and should be discussed.	Language will be added to indicate that the need to transfer the tank contents is also a possibility.

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File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
36.	Section 9.2.1	9-3	** The process for responding to a statistically significant difference for this CERCLA action requires more than that provided for a RCRA/HWMA permitted facility. At a minimum, the initial notification should include an assessment of available historical leachate sump sampling results, a comparison of leachate pumping records to expected volumes, and perched well sampling results. DISCUSSION: In addition, some mitigation efforts should initiated if there is a correlation between the detected contaminant with leachate sump and/or perched well data. For example, more frequent sump pumping if the landfill is the source, or more accurate determination of water balance of the evaporation ponds if they are the suspected source.	The details on notifications and data submittals have been moved to Appendix H. We agree that an assessment of available historical leachate sump sampling results, comparison of leachate pumping records to expected volumes, and perched water sampling results needs to be made if a statistically significant exceedance is found. However, this bullet refers to the initial notification to the Agencies that will occur. ICDF management will notify the Agencies, begin an investigation, and share the information with the Agencies. A new bullet will be added to state that ICDF will "immediately begin working with the Agencies on an investigation into the source of the exceedance, including reviewing available historical leachate sump sampling results, leachate pumping records and expected volumes, and perched water sampling results."
37.	Section 9.2.1, last para.	9-3	The groundwater monitoring data reporting requirements and notifications for the ICDF Complex are discussed in this section of the text. Groundwater monitoring data is referred to without any distinction made between the SRPA wells and the perched water wells. The text should include a statement that data collection and reporting requirements apply to both the SRPA wells and the perched aquifer wells when water is present in them although the analytical requirements may be different. In addition, the perched wells should be checked for water at the same frequency as the SRPA wells are sampled and, in	Text will be modified to be specific regarding perched water and SRPA. The first sentence will be modified to "The ICDF Complex will conduct a detection monitoring program in the SRPA in accordance with 40 CFR 264.97(g) and the Groundwater Monitoring Plan (DOE/ID-10955)." A new paragraph will be added at the end of this section: "Although not part of the detection monitoring program at this time, water quality will also be monitored concurrently in the perched water and data reported to the Agencies in accordance with the FFA/CO. During routine monitoring of the SRPA, water

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
			the event that there is very little or no water present in the perched aquifer wells, that the data be recorded and included as part of the groundwater monitoring report. (JR)	levels will be measured in the perched water wells. If sufficient water is available, samples will be collected in accordance with the Groundwater Monitoring Plan (DOE/ID-10955). If the decision is made by the Agencies that it is appropriate to add the perched water wells to the detection monitoring network, Appendix H will be modified."
38.	Table 9-1	9-6	Is it the S&A Plan or S&A Plan results?	Will be clarified.
39.	Section 10.6.2	10-8	** Record keeping requirements are specified at Section XX of the FFA/CO. Also, attempts at accessing the website were unsuccessful?	The web site is inside the firewall and will be deleted in the text. Language will be changed to reflect FFA/CO requirements.
40.	Appendix A, Section 4	--	The equipment listed does not appear to correspond to that listed in Appendix B?	The Appendix B list will be modified to include key equipment identified on the overviews.
41.	Appendix B, Table B-1	B-3	This list should identify the minimum amount of equipment needed and therefore, TBCs equal a minimum of "1."	The number of roll-on/roll-off containers (and tarps) procured will be significantly greater than 1. The actual number needed will be a function of the volume of waste that will be disposed each day. No text change.
42.	Appendix B, Table B-5	B-8	Other equipment, e.g., fire extinguishers, spill cleanup kit, etc should also be listed here.	A fire extinguisher would be present on each piece of equipment listed in Table B-5. It does not need to be listed separately. Spill kit is currently on-Site at the SSA and will be added to the list. No text change.

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File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
43.	EPA Comments #46 and #53 on the Draft RAWP	--	Please make the decon procedures listed in Section 4.3.9, Page 4-9 of the RAWP agree with those listed in Section 1.2.2, Pg 1-8 of Appendix A. (AE)	The sections will be reviewed for consistency.

a. Items with ** indicate comments of particular concern.

File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-11046 (Appendix B)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
44.	Section 2	2-1	The scope of the document should be for all generators planning to use the ICDF Complex, both for remedial and removal wastes.	The paragraph will be clarified to provide the following information: This document applies to all generators of CERCLA removal and remediation wastes within the INEEL that plan to dispose of such waste streams at the ICDF Complex. Generators of CERCLA removal and remediation waste that is destined for disposal at the ICDF Complex must be familiar with the guidelines in this document as well as the WAC for the ICDF Complex and its related units (e.g., treatment, disposal).
45.	Section 4.1.3	4-1	** As commented on in Section 2, all generators planning to use the ICDF Complex, both for remedial and removal wastes, should be subject to these requirements. This should also be an i.e., not an e.g.	The first paragraph will be revised as follows: The ICDF Complex only accepts waste streams generated by CERCLA activities (i.e., investigation, Notice of Disturbance [NOD], removal, or remediation) at the INEEL. Generators of CERCLA removal and remediation waste that is destined for disposal at the ICDF Complex must be familiar with the guidelines in this document, as well as ICDF Complex operations described in the ICDF Complex RAWP and the ICDF O&M Plan. These documents were developed to ensure compliance with the OU 3-13 ROD and the protection of human health and the environment. Additional documents such as the ICDF Complex, landfill, and evaporation pond WAC were developed to ensure that

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-11046 (Appendix B)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				the operational limits of the ICDF Complex are not exceeded.
46.	Section 4.2.2	4-2	** This SAP discussion needs to be expanded to explain the sequential obligations of the generator. First, the information supporting the decision document for the source area needs to be reviewed, by the generator group to identify any characterization data gaps. Necessary sampling and analysis is performed to fill these gaps. Second, COC-specific maximum levels need to be established by the Generator based on this characterization work. Third, the generator submits the material profile. In preparing the Material Profile, the generator needs to understand how verification sampling will be performed to avoid arbitrary biasing the characterization data high, as closeness to the WAC limit results in an increase in p and 1-α in verification sampling requirements.	The following paragraph will be added as the second paragraph to the section: Each generator is responsible for developing a SAP. The SAP is the primary support document for the Material Profile. The generator submits the Material Profile to ICDF personnel, who will perform independent verification sampling as described in the *ICDF Complex Waste Verification Sampling and Analysis Plan*. This plan will be made available upon finalization to all appropriate generators. As sampling occurs, the generator should understand that an unsupported conservative bias that is at or near the WAC limit will result in p and 1-α in verification sampling requirements. The first and third paragraphs will remain unchanged.
47.	Section 5.1	5-1	The characterization needs to be sufficient to permit acceptance of the waste profile. This is separate from verification sampling.	Comment noted. No text change.
48.	Section 5.1.1.2	5-2	** There should be a discussion informing the generator that their waste characterization information, specifically the concentration range "to" information, will be used to determine the appropriate level of verification sampling required and that failure to meet verification requirements will result in rejection of the waste load.	The second paragraph will be changed as follows: The minimum level of acceptable knowledge must include: (1) designation data where the constituents causing a listed waste code to be assigned are quantified and (2) data that address acceptance criteria necessary for proper management of the waste. The generator

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-11046 (Appendix B)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				should be aware of waste verification procedures outlined in the *ICDF Complex Waste Verification Sampling and Analysis Plan*. The information provided by the generator determines the level of verification necessary for entry into the ICDF Complex. Failure to meet the WAC limits and other verification criteria could result in rejection of the waste shipment.
49.	Section 6.2, 2nd bullet	6-2	This procedure requires that ICDF personnel take all verification samples? DISCUSSION: Providing an opportunity for the generator to obtain *in situ* random samples should also be considered.	"conduct" will be changed to "direct".
50.	Appendix C	6-2	This screen should also identify the status of the required verification sampling.	Verification will become part of the record to demonstrate compliance. A verification sampling approach needs to be resolved. Once this is agreed upon, a box will be added to the OWTF to check that adequate verification has been performed. No text change.

a. Items with ** indicate comments of particular concern.

File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: PLN-914 (Appendix C)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
51.	Section 3.1, last para.	10	** There should be discussion informing the generator that access to the waste will be required if the ICDF personnel perform the verification sampling. DISCUSSION: The excavations will probably involve a subcontractor and the contract will need to discuss ICDF access to the waste.	Text will be enhanced briefly to provided requested clarification.
52.	General	13	** Given the number of random verification samples that may be required to pass the exceedance rule, the document is not clear on when and how these samples are taken. It appears that at Section 5.1, verification sampling occurs at the ICDF gate; however, agency discussions suggest that this will be done prior to packaging. A new section should be added here explaining the process and the role of the generator, e.g., access, in the verification sampling.	DOE/ID-11046 (Appendix B) and DOE/ID-10985 (Appendix D) are more appropriate documents to provide guidance on where, how, and how many verification samples are taken. The preamble of the referenced Section 5.1 states: "the shipment (e.g., containers) and corresponding paperwork (e.g., OWTF, LDR notification, etc.) will be checked before acceptance". The subtitle of Section 5.1 will be changed to "ICDF Receipt Inspection" to alleviate confusion.
53.	Section 7.1, 2nd para.	18	** Leachate sampling is performed monthly on selected constituents and this data needs to be tracked also.	Text will be modified to remove periodicity reference (e.g., quarterly) with regard to sampling leachate as all constituent data will be used without regard to sampling periodicity. The process that will be followed is as specified.

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: PLN-914 (Appendix C)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
54.	Section 8	19	It is unclear whether wastes which fail verification sampling for landfill acceptance prior to start of shipments will still be accepted into the ICDF Complex for staging/storage awaiting amendment of material profile and additional verification sampling. This needs to be discussed.	As a rule, waste that failed verification sampling (i.e., did not meet landfill WAC), prior to the start of shipments, will not be accepted into an ICDF staging area pending additional verification sampling and amendments to IWTS Material/Container Profiles. Storage and staging areas are intended to hold wastes requiring treatment prior to disposal, or waste requiring repackaging prior to being sent off-Site. However, this does not mean that the errant container, identified during receipt inspection, cannot be placed in the truck holding/staging/storage area pending resolution.

a. Items with ** indicate comments of particular concern.

File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
55.	Section 2.6 General	--	This section is confusing in its specification of Type 1 and Type 2 error. Recommend revisions to specify that this section only applies to the verification sampling; that the method chosen for verification sampling addresses Type 1 error only; that the Type 1 error risk in this case is that more than the specified percentage of the waste may be in exceedance of the maximum specified on the waste profile; and that Type 2 error is implicitly addressed in that if none of the lot exceeds the specified maximum, then there is no chance that the lot will fail the verification. (LW)	Section 2 heading states that it addresses the DQOs for Waste Verification only. Section 2.6 will be re-written as follows: The Type 1 error is making the incorrect decision and saying that for any key parameter no more than the specified percentage of the waste may be in exceedance of the maximum specified on the Material Profile when for that key parameter more than the specified percentage of the waste exceeds the maximum specified on the Material Profile. The risk from Type 1 error is possible exceedance of the landfill WAC or operational criteria or possible procedural violation. The Type 2 error is making the incorrect decision and saying that for any key parameter more than the specified percentage of the waste may be in exceedance of the maximum specified on the Material Profile when for that key parameter, no more than the specified percentage of the waste exceeds the maximum specified on the Material Profile. Decisions based on the results of verification sampling will be made using the simple exceedance rule (EPA 2002). Therefore, if none of the waste in a lot exceeds the maximum specified on the Material Profile, then there is no chance that the lot will fail the verification and hence no Type 2 error is possible.

a. Items with ** indicate comments of particular concern.

File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				For verification sampling, decision error limits will depend on the magnitude of the concentration specified on the upper limits of the Material Profile for a given key parameter with respect to the applicable limit. The Type 1 decision error limit for waste verification will range from 5 to 25%, depending on the concentration of the waste associated with a Material Profile, and will be set with the use of a simple exceedance rule (EPA 2002). Risks cannot be specified if verification sampling is not required. The decision definitions in Sections 2.2 and 2.5 are also inaccurate and will be modified.
56.	Section 3.2.1	3-2	** Without verification sampling (e.g., assay) how will DOE assure that the debris does not qualify as alpha LLW or TRU wastes? This concern needs to be addressed.	This is a characterization issue, verification will only address whether the calculations were done correctly.
57.	Section 3.3.2, 1st para.	3-2	This sentence states that visual inspection will be performed prior to shipment to the ICDF either at the excavation site or at the ICDF. Please resolve this apparent inconsistency. (LW)	Sentence will be re-worded: "One hundred percent visual inspection will be performed for all waste prior to placement in the ICDF landfill, either at the excavation site or at the ICDF Complex."
58.	Section 3.3.4, 1st para.	3-3	The discussion on the 500mg/kg limit for VOs is confusing as this requirement applies to wastes going into the surface impoundment, not the landfill. It would appear that periodic sampling of the leachate in the sump could be used to determine what the average loading of VOs to the evaporation ponds is?	The 500-mg/kg limit is artificially low for the landfill since this regulatory limit should only apply to the surface impoundment. Therefore, efforts will be undertaken to provide a reasonable limit for the landfill that will result in a not-to-exceed 500 ppm in the pond. This will require a revision to the ICDF Complex WAC.

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
59.	Section 3.3.4, 3rd para.	3-3	** The basis for the simple exceedance rule assumes random sampling from a lot with a constant probability of exceeding the maximum specified on the waste profile. This means that an independent, random sample for verification must be drawn from the lot, not 'piggy-backed' onto existing 'probability samples' used to characterize the waste stream for the waste profile. This fact needs to be made clear in this section. (LW) DISCUSSION: We strongly recommend that this paragraph make it clear that the verification sample locations are randomly selected independent of the characterization sample locations. If characterization data exists within a population unit independently sampled for the verification test, and it meets the other requirements detailed in the next comment, then it may be used as a sample for the verification test.	Section 3 (and other places within the document that reference the "old" plan) will be re-written to explain the revised verification plan. The summary of the plan follows. Verification is required to confirm that the key parameters in the waste do not exceed the limits on the Material Profile. For soil waste requiring verification sampling, the verification decision will be based on application of the simple exceedance rule. The specified confidence and percentage of waste required to be within the limit will vary, depending on the concentration specified on the Material Profile with respect to the Waste Acceptance Criteria. Those key parameters with concentrations close to the WAC will require greater confidence and percentage of waste within the Material Profile. Verification data requirements (sample size) for waste specified on a Material Profile can be obtained from a revised Table 3-1 (as presented for the 1/15/03 conference call). A process flow chart (similar to the one presented for the 1/15/03 conference call) will be provided in the text to clarify the verification process and define responsibilities. All samples taken, after the Material Profile is approved, in support of the verification decision will be taken under the direction of ICDF, by WGS personnel. This fact is reiterated in the revised Table 3-1, which no longer specifies a characterization lot sample size

a. Items with ** indicate comments of particular concern.

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				separate from a verification lot sample size. The verification sample selection for a given Material Profile will be independent of any characterization sample selection performed by the generator. The maximum size of a lot will be 5000 yd^3. The maximum size of a population unit will be 50 yd^3; the minimum population unit size will be 15 yd^3. Verification sample selection must be flexible to accommodate insitu waste and waste that is or will be containerized prior to verification sampling. However, for each Material Profile, verification sampling requirements will follow one approach; a mixture of insitu and container sampling approaches will not be allowed for a single Material Profile. 1) For sampling insitu wastes, the volume of waste will be divided into lots of size no more than 5000 yd^3 and the population unit will be a maximum of 50 yd^3. If the lot size is less than 5000 yd^3, then the lot will be divided into approximately 100 population units, with a minimum population unit size of 15 yd^3. After being divided into lots, a three-dimensional grid of specified population unit size will be overlain. The required number of samples will be selected from randomly chosen grid cells. Using this sampling approach, data from previously collected samples that fall within randomly selected grid cells can be used if they were collected and analyzed using comparable methods and

a. Items with ** indicate comments of particular concern.

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				are recent enough so that temporal change is not an issue. It is expected that only a few generators will have previously collected sample data meeting these criteria. 2) For sites where insitu waste verification sampling will not be performed prior to excavation, a grid will not be utilized. Rather, a random sample of containers within a lot will be chosen. (A lot being no more than 5000 yd^3 and a population unit size being at least 15 yd^3.) This applies to waste that is or will be containerized prior to verification sampling. If a previously collected sample is available from that container, it can be utilized for verification of containerized wastes. Data from previously collected samples can be used if they were collected and analyzed using comparable methods and are recent enough so that temporal change is not an issue. All verification samples will be required to be representative of the waste in a given population unit. As such, properties of the COC must be taken into account in order to represent the concentration of the COC in the sample (e.g., for previously containerized waste, an auger sample would be taken if any question of homogeneity in that population unit existed). All samples will be collected following EPA-approved sampling methods. For waste streams larger than 5000 yd^3, the waste stream will be divided into approximately equal size lots as close

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				to 5000 yd^3 as possible. This will be done in order to allocate samples evenly among lots within one waste stream and to maintain a constant population unit size for waste stream. For example, a waste stream of 7000 yd^3 would be divided into two lots of 3500 yd^3 instead of one lot of 5000 yd^3 and one lot of 2000 yd^3. If the waste stream is small enough that approximately 100 population units do not exist (i.e., the waste stream is less than 1500 yd^3), then the required number of verification samples will be taken from the available population units. If the number of available population units is equal to or less than the required number of verification samples, then each population unit will be sampled. Footnote b of Table 3-1, as presented for the 1/15/03 conference call, will be modified as follows: "A maximum of one sample per population unit will be taken. The maximum size of a population unit will be 50 yd^3; the minimum size of a population unit will be 15 yd^3." The flowchart presented for the 1/15/03 conference call will be modified to: 1) Add a decision box to determine if verification passed with lines to "Is Data Adequate for Material Profile?" if verification fails and "Accept Waste into ICDF" if verification passes.

a. Items with ** indicate comments of particular concern.

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				2) Revise decision box "Does previous data meet verification requirements?" to specify that the verification data are independent of characterization.
60.	Section 3.3.4, 3rd para.	3-3	The 3rd sentence is unclear. DISCUSSION: Recommend revising this sentence as follows: "The generator may use existing data if the samples *(a) are located within population units randomly sampled for the verification testing (see Section 3.3.4.2),* (*b*) are representative of the waste, (*c*) were collected and analyzed with comparable methods that meet the DQOs, and (*d*) the samples are timely (no unexpected significant change in concentration is suspected from when the samples were collected and the present time)." (LW)	Any discussion of the samples that the "generator may use" will be removed from the document. As stated in the response to Comment #59, all samples taken after the Material Profile is approved in support of the verification decision will be taken under the direction of ICDF, by WGS personnel.
61.	Section 3.3.4, 3rd para.	3-3	The 5th & 6th sentences are unclear. DISCUSSION: Recommend adding the following sentence: *"If no existing data has been collected for a randomly sampled population unit, then the generator will collect a new verification sample."* (LW)	See response to Comment #60.

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
62.	Section 3.3.4, 3rd para. 5th & 6th sentances	3-3	** The sentences "If the generator has collected sufficient characterization samples to meet the second stage sample requirements, then additional verification samples will not be required. Both the characterization and verification samples must be from a probability sample and analyzed using comparable methods," should be deleted. Characterization sampling and verification sampling are two independent sampling efforts. (LW)	See response to Comment #60.
63.	Section 3.3.4.1, 2nd para.	3-4	** Population unit size should be made flexible to deal with lots that consist of previously containerized soil waste, as well as lots that are much less than 5000 yd^3. The sentence needs to be revised to read, "The population units within each lot are defined to be *no more than* 50 yd^3, allowing *approximately* 100 population units per lot." (LW)	See response to Comment #59 on population unit size.
64.	12/04/02 revision Section 3.3.4.2, 1st para. 1st – 3rd sentances	3-5	** Regarding the sentences: "Representative samples are required for both stages of verification sampling. For verification sampling, a representative sample must be obtained from a probability-based sample design, not through a convenience or biased-sample design. A representative sample is most easily accomplished via simple random sampling." This should be revised to read: *This verification sampling method requires independent random samples be drawn from the waste stream.* The verification method chosen is derived from acceptance sampling based on the binomial distribution (see attached document, "Verification Sampling Issues" for the derivation of the sample size equation). This "zero-defect"	The exact proposed wording will not be incorporated into the revised text due to other changes in Section 3. However, as stated in the response to Comment #59, the verification samples will be required to be independent of any characterization samples.

a. Items with ** indicate comments of particular concern.

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
			acceptance sampling is based on independent random samples drawn from a lot with a constant probability of exceeding the maximum specified on the waste profile. The verification sampling must be independent of the characterization sampling. (LW)	
65.	12/04/02 revision Section 3.3.4.2, 2nd para. 2nd sentance	3-5	Sentence is unclear. (LW) DISCUSSION: Recommend revising this sentence to read: "ICDF users may utilize existing data to meet these requirements if the existing data are from samples *that are located within* a randomly selected population unit, were collected and analyzed with comparable methods, and are timely."	See response to Comment #60.
66.	Revised 12/04/02 Section 3.3.4.2, 2nd para. 3rd sentance	3-5	Sentence is unclear. (LW) DISCUSSION: Recommend revising this sentence to read: "*If qualified existing data does not exist for a population unit selected for verification sampling,* the ICDF user must collect *and analyze the sample* to meet the requirements of Table 3- 1."	See response to Comment #60.

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
67.	Revised 12/04/02 Section 3.3.4.2, 3rd para.	3-5	Paragraph is unclear. (LW) DISCUSSION: Recommend revising this paragraph to read: "To meet the stage two verification requirements, the ICDF waste specialist *must select additional random samples within the lot, as specified in Table 3-1." In order to attain the added level of certainty, these additional samples cannot be from the population units randomly sampled by the generator for verification, but must be pulled from the remaining unsampled population units.*	Paragraph will be re-written and any reference to the two-stage approach will be removed. See response to Comment #59.
68.	EPA Comment #100 on the draft RAWP		The response to this comment specifies that the sampling unit will be 10 yd^3. The text specifies a 50 yd^3 unit. Please resolve the inconsistency. (LW)	The comment resolution should have been changed to specify a flexible population unit will be specified. The maximum size is 50 yd^3 and minimum size 15 yd^3. These sizes are based on homogeneous waste for the Material Profile.
69.	EPA Comment #141 on the draft RAWP		The text in Section 6.2, Page 6-2 was not modified as stated in the Resolution. (AE)	The initial comment by EPA (Comment #141) applied to Section 6.3, not Section 6.2 as stated. Therefore, this issue was resolved in the resolution made to the first paragraph of Section 6.3.

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: EDF-ER-327 (Appendix E)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
70.	Section 2.1, 1st bullet	2-1	** The reference to 10 CFR 835 is not appropriate, as it is not an ARAR under the OU 3-13 ROD. Second, it applies to occupational exposure, not public exposure; and third, it is not protective as the resultant risk exceeds the acceptable CERCLA risk range.	Text modifications. Compliance with 10 CFR 835 is not referenced as an ARAR; rather, it is used as an occupational standard for radiological exposure. Radiological limits from 10 CFR 835 are used for the Radiation Worker II and General Employee Radiation Training Worker scenarios. In response to the second point, the text acknowledges that unrestricted public exposure and members of the public entering the site should be limited to 15 mrem/year, a value approximately equivalent to an ELCR of $1x10^{-4}$ (a value within the CERCLA risk range.), acknowledging that this is not a cumulative expression. It is acknowledged that the modeled concentrations are identified as exceeding a cumulative value. Additional briefings and awareness will be identified for those nonworker receptors. In response to the third point, the RAWP recognizes that radiological exposures will have to be mitigated to acceptable levels that are protective of occupational personnel and visitors to the ICDF Complex. Please refer to Section 6 of EDF-ER-327 and Section 3.7.5 of the O&M Plan for this discussion. Additional text will be included that discusses the inclusion of briefings and awareness discussions prior to nonworker receptors being provided access to the site.

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: EDF-ER-327 (Appendix E)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
71.	Section 2.2 and General	2-1	** CERCLA risk levels apply to the combined radiological and nonradiological risk, as both are hazardous substances. The ELCR is the combined radionuclide and nonradionuclide risk for the reasonably maximum exposed individual. A 10E-4 risk has been calculated to result from a 15 mrem/yr radiation exposure, under the residential scenario. If nonradiological substances are present, the acceptable dose is diminished to remain under the 10E-4 cumulative risk level.	Text will be changed to include a discussion of the cumulative risk. See response to EPA Comment #70. It is acknowledged that CERCLA risk levels apply to the combined radiological and nonradiological risk. The cumulative limits for combined radiological and nonradiological risk are 1E-04 ELCR and a HI of 1. As noted in Section 2.1, the 15 mrem/year is approximately equivalent to the 1E-04 ELCR. In the case of the ICDF visitor scenario and INEEL visitor scenario, Table 2-3 of EDF-ER-327 shows that nonradiological ELCR is 3 to 4 orders of magnitude below the 1E-04 risk limit, whereas the radiological TEDE is within the same order of magnitude as the 15 mrem/year (roughly equivalent to 1E-04 for residential scenario). Therefore, the predominant contributor to cumulative risk is from radiological constituents by external radiation. So while cumulative risk is the true standard for comparison, ICDF visitor exposure will be predominantly governed by the radiological contribution to total risk.

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: EDF-ER-327 (Appendix E)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
72.	Section 4.2	4-6	A section on how ICDF and INEEL visitors will be protected from exceeding a radiological and nonradiological risk of 10E-4 is not explained in Section 6. DISCUSSION: A log, tracking the duration and frequency of visits, would be one form of mitigation.	See response to EPA #70. Section 6 of EDF-ER-327 does not attempt to discuss protecting visitors from exceeding radiological and nonradiological risk greater than 1E-04; Section 6 provides radiological mitigation, whereas the HASP provides nonradiological health and safety protocols for all potentially exposed individuals (workers and visitors). As discussed in the response to EPA Comment #71, the nonradiological contribution to total risk is estimated to be 3 to 4 orders of magnitude below the 1E-04 risk limit. As such, tracking of total risk will be performed only for radiological constituents by external exposure. Dosimeters will be used to determine exposure to all ICDF visitors. This information will be tracked, either by keeping a log, or by use of the RCIMS (as described in Section 3.7.5.2 of the O&M Plan) for ICDF visitors. Additional reference to the HASP and Section 6 will be provided in Section 1. In addition, clarification as to the rationale for separate action levels will be provided in Section 1.

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: INEEL/EXT-01-01318 (Appendix F)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
73.	General	--	** Procedures to insure that ICDF visitors are not exposed to an unacceptable risk, i.e., 15 mrem/yr need to be discussed, along with what records will be maintained on ICDF visitors, to determine their annual exposure history	The radiation dose limit for the unrestricted public exposure scenario (i.e., Highway 26 Rest Area visitor) and the member of the public entry (i.e., INEEL visitor, ICDF visitor) is 0.015 rem/year. This dose limit is developed for members of the public who are unknowingly exposed to radiation and is approximately equivalent to an excess lifetime cancer risk (ELCR) of 1×10^{-4}. The uninformed visitors may be permitted to enter fenced areas of the ICDF Complex, but will be denied access to Radiation Buffer Areas (RBAs), Radiological Areas (RAs), or Contamination Areas to ensure their exposures are not in excess of established limits. Informed visitors are trained and escorted by trained ICDF personnel. The informed visitor entering radiological controlled areas will be required to complete the level of training for entry including General Employee Radiological Training (GERT) and up to Radiation Worker I in addition to having a dosimetry badge issued. The radiation dose limit for the informed visitor is 0.1 rem/year (10 CFR 835). This dose limit is developed for members of the public who have received radiation training/briefing and who understand and are willing to accept the risks of radiation exposure. Visitor radiological exposure records are maintained and tracked to ensure their annual exposures limits are not exceeded. If an informed

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: INEEL/EXT-01-01318 (Appendix F)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				visitor reaches the established radiological limits, their access to radiological areas will be removed until the following calendar year. Records are tracked by social security number for visitors. Dosimetry will not be issued to visitors who have reached the administrative radiological exposure limits serving as the access control method. Please see EPA Comment #70. Text will be added to the HASP to discuss visitor and public personnel.

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10886 (Appendix G)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
74.	Section 3.1, 3rd bullet	3-1	The correct citation for determining if placement is triggered at a CERCLA site can be found in OSWER Directive 9347.5-O5FS, 7/89, Superfund LDR Guide #5	Citation will be corrected.
75.	Table 3-1	3-3	** Industrial waste needs to be distinguished into solid wastes, which are wastes not containing hazardous substances, as defined as 40 CFR 300.5, otherwise the wastes are CERCLA wastes, which require disposal in the ICDF landfill.	Understand the confusion. The text will be modified to clarify that solid wastes, which are not hazardous waste or low-level waste, will be sent to the INEEL Landfill Complex, subject to meeting the disposal facility WAC.
76.	Table 3-1	3-7	Although it is unlikely they will be generated at the Complex, alpha low-level waste, TRU waste and high-level waste should also be discussed, as they may be generated due to spill cleanup of temporarily stored wastes at the complex.	Section 3.2 on page 3-2 will be modified to: "Table 3-1 identifies and describes the waste types that are expected to be generated as a result of ICDF Complex operations, management strategies, and the proposed disposition of the waste types. In addition to the waste types included in Table 3-1, alpha low-level, transuranic, and high-level wastes could potentially be generated by the ICDF Complex due to spill cleanup of temporarily stored wastes at the Complex. In the event that transuranic or high-level wastes are generated at the Complex, these wastes will be properly containerized in compatible containers for the waste type and the waste containers will be stored in a safe configuration. These wastes will be added to the Waste Management Plan.

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10886 (Appendix G)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
77.	Section 4.3.1, 3rd bullet	4-2	** It needs to be made clear in using the term hazardous wastes that it applies to all CERCLA wastes containing hazardous substances or another term needs to be applied.	Comment will be incorporated. The "Hazardous waste" line in Table 3-1 (page 3-5), in the Description column, will be changed to: "Waste designated as CERCLA to include hazardous by the EPA regulations (40 CFR 261.3)." The 3rd bullet on page 4-2 in Section 4.3.1 will be modified to: "Personnel must reduce HW by segregating hazardous and nonhazardous materials. Hazardous materials are CERCLA wastes containing hazardous substances as defined by 40 CFR 261.3."

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10998 (Appendix H)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
78.	Section 2, 1st para.	3	This section of the report, which discusses the detection monitoring program, states "The detection monitoring program will be modified as necessary to address the six perched water wells, as data and/or additional information becomes available." The perched groundwater monitoring wells should be included in the groundwater-monitoring program from the programs initiation, as these wells will provide data on the perched groundwater conditions whether or not there is groundwater present. The text should be amended to indicate the perched groundwater wells will be monitored for the presence of water, that samples will be collected if possible, and that these wells will be checked at the same frequency as the SRPA wells specified in paragraph five of this section. (JR)	We agree that the perched water levels should be checked during routine monitoring of SRPA wells and sampled if sufficient quantities exist, which is included in the GWMP (DOE/ID-10955). However, the purpose of this plan under review is to determine the methods that will be used to statistically analyze the data. As statistical analysis of the perched water wells is more complicated than analysis of the SRPA wells, the Agencies will reach consensus on how to evaluate the perched water wells in May 2003 once validated baseline data are available. The requested text is already included in the GWMP (DOE/ID-10955). No change to text until consensus is reached in May.
79.	Section 2.5, 2nd bullet	8	** Requiring a first and then a second round resampling event be conducted prior to initiating agency notification and investigation of potential sources of the contamination is inappropriate, as these follow-up sampling results do not, by themselves, overcome QA approved data. Agency personnel should be informally notified of a potential release based on raw data received from the original sampling round. (JR) DISCUSSION: Also, these wells may provide data indicating increases or decreases in contaminant concentrations within the vadose zone and may be helpful	See response to Comment #80.

a. Items with ** indicate comments of particular concern.

File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10998 (Appendix H)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
			in evaluating future increases in, what are at present, assumed to be background contaminant concentrations in SRPA.	
80.	Section 2.7	9	**** Pursuant to Section 19.1 of the FFA/CO, please let this comment serve as an official request from EPA for periodic summary results of all non-quality assured data related to the ICDF Complex detection monitoring program. Our request is to receive this data as soon as practical after receipt by DOE and/or its contractors. We understand and agree, pursuant to Section 19.2 through 19.4 to maintain this data as confidential and to not use this data as a basis for Agency decision.**	We assume EPA meant to refer to Section 19.2 of the FFA/CO. At EPA's request on the conference call on 1/8/03, in order to cut down on the volume of paper, either Forms 1s will be provided or unvalidated data will be discussed on a conference call, unless a more complete unvalidated data package is requested specifically.
81.	Section 2.8, 1st para.	10	This description of the replacement of SRPA wells in the event of a monitoring well failure should also include a statement that the replacement wells will be constructed to monitor the same flow zones as the original well. The same hydrogeologic sections of the formation that were screened to produce water in the failed well should be identified during drilling and borehole logging of the replacement well and, if present, these same flow zones screened in the replacement well. This will provide consistency between the analytical data collected from the original and replacement wells. (JR)	If the well fails due to structural problems, the well will be replaced to monitor the same flow zones. If the well goes dry due to water levels in the SRPA dropping, the well will be deepened or replaced with a sufficiently deep well to obtain reliable samples. If abandoned, the well will be abandoned in compliance with substantive State requirements.
82.	Section 3	11	** All QA statistical exceedances will require follow-up investigation, regardless of the results of follow-up sampling.	Text will be modified to indicate that any validated statistical exceedance will be investigated.

a. Items with ** indicate comments of particular concern.

File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10998 (Appendix H)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
83.	Section 4	12	The text discusses the potential of adding perched water to the ICDF detection monitoring system. Either the presence or absence of groundwater in the perched zones at ICDF provides data necessary to identify potential landfill leakage. In addition, these wells may provide data indicating increases or decreases in contaminant concentrations within the vadose zone and may be helpful in evaluating future increases in, what are at present, assumed to be background contaminant concentrations in SRPA. (JR)	See response to EPA Comment #78.
84.	Section 4	12	It is unlikely that sufficient information will be available by April 2003 to determine whether a perched groundwater detection monitoring network will be required, as seasonal influences of the Big Lost River needs to be factored into this decision.	The perched water that has been found in 3 of the 18 perched water monitoring points has the same chemical signature as the percolation pond water (high in chloride and Na). No perched water was found underlying the ICDF that has a Big Lost River signature. Although Big Lost River water may migrate under the ICDF during a future flow event, no persistent perched water from the many past Big Lost River flow events exists. Baseline perched water evaluation will be provided by May 2003.

a. Items with ** indicate comments of particular concern.

File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10903 (Appendix I)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
85.	Section 3.3.4	3-7	Although this should not be a concern for Portland cement stabilized wastes, a compressive strength of 50 psi is also a requirement for stabilized waste disposed in the ICDF landfill.	Comment noted. No text change.
86.	Section 10	10-1	Although a Community Relations is an important consideration in the RAWP, this should be a component of the O&M Plan or a stand-alone appendix.	Section 10 will be deleted and community relations will be conducted in accordance with the INEEL Plan. Also, some information is included in Section 11 of the RAWP.

a. Items with ** indicate comments of particular concern.

File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-10924 (Appendix J)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
87.	Section 3.4	3-2	** What instructions will be provided to the generator to insure that the sample provided is a sample with COCs biased high to test the effectiveness of the treatment?	Waste sampling for effectiveness of treatment is in DOE/ID-10903. Language will be added to the Treatability Test Plan to indicate that the sample needs to be biased toward high COCs and most difficult waste form.
88.	Section 2.7.2	2-6	** It is not clear what the total number of composite samples is from the described progression. Are there five individual composite samples or one composite samples if all steps 1 through 4 were needed? The later approach is unacceptable due to dilution effects.	There are a minimum of 16 samples per treatment campaign, assuming there are at least 43 containers. For every 10 additional containers, two samples would be added. No text change.

a. Items with ** indicate comments of particular concern.

File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: EDF-2236 (Appendix K)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
89.	Section 4	12	If the annual emission estimate exceeds 1 mrem/yr, a draft plan for measuring or otherwise determining the release of radionuclides from the ICDF Complex is required. DISCUSSION: It would also be appropriate to submit a plan for additional mitigation efforts to reduce the overall NESHAP emissions from the ICDF Complex below the 10% level.	The WAC states that DOE will notify the Agencies. If the 1 mrem/year is exceeded, DOE-ID will hold discussions with the Agencies regarding further actions and perhaps more detailed monitoring.

a. Items with ** indicate comments of particular concern.

File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: EDF-2237 (Appendix L)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
90.	Section 3.1	3-1	Although using the design inventory is appropriate for pre-operations, updating this inventory based on approved material profiles should be a requirement in assessing the next year emissions rate.	No text change. The design inventory was used as a starting point for the modeling to establish mass-based operational limits. The setting of operational limits for the ICDF Complex allows the operation to proceed without having to remodel - as long as mass limits are below the established limits, IDAPA emissions would not be exceeded. The mass limits that are established provide information to the ICDF Complex management about potential placement constraints, and offer options to prevent IDAPA exceedances (e.g., staging).

a. Items with ** indicate comments of particular concern.

File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: DOE/ID-11005 (Appendix M)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
91.	Section 1.1, 1st para.	3	How will annual monitoring of evaporation pond water yield useful data on the annual emissions from this emission source? DISCUSSION: It may be useful to use the results of the semiannual and monthly ^{129}I, LCRS sampling to supplement this data.	Sentence has been deleted from the section.
92.	Section 1.1, 3rd para.	3	** Periodic sampling of the PLDRS and LDRS for an indicator parameter, e.g., specific conductance, can prove useful in supplementing the ALR data and understanding the functioning of the liner system	Section 3.3, Table 1, states that specific conductance will be one of the parameters that will be analyzed. Temperature, pH, and SC will be added for the PLDRS and the SLDRS and the O&M SAP reviewed for consistency.

a. Items with ** indicate comments of particular concern.

File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: Schedule (Appendix N)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
93.	Schedule Fig N-1	N-5	** The project schedule should consist of a critical path schedule for meeting enforceable deadlines and a working schedule. The CPM with enforceable deadlines is required and is not provided.	Two project schedules will be provided in the final RAWP—an enforceable and a working schedule. Both schedules will be developed using critical path methodology.

a. Items with ** indicate comments of particular concern.

File 02-m1341

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: EDF-2385 (Appendix O)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
94.	General	--	The cost comparison looks at the universe of wastes to identify a cost comparison ratio. It is also appropriate to include a brief discussion in terms of a sensitivity analysis on whether there are any potential waste streams in the inventory, which may be more suitably disposed of off-site?	No change to text - With the exception of CPP-69C (tank and contents), only waste streams that met the ICDF landfill WAC were considered in the evaluation for this EDF. The waste stream associated with CPP-69C amounts to 4 yd^3 out of a total of 469,386 yd^3. This small amount would not change the calculation to an extent that would show up in the presented results. As such, a sensitivity analysis is not necessary for this EDF. Also, as presented in Appendix C (Table C-2, page C-5) there is a cost presented for the disposal of the CCP-69 waste along with another 6 yd^3 at an off-Site location (Nevada Test Site). Further details on the off-Site disposal element are presented in Appendix G (Item G-1.2.2.9, page G-9). On the other hand, considering cost effectiveness of other waste streams that are destined for off-Site disposal for candidate waste streams at the ICDF Complex could result in a change to the comparisons. However, this may require changes to the OU 3-13 ROD and ICDF Waste Acceptance Criteria documents to make it possible. Changes that go outside of the OU 3-13 ROD or ICDF Waste Acceptance Criteria documents were not considered in this document and at this time there is no benefit to consider these other waste streams. The intent of this EDF was to continue to present the cost of on-Site disposal at the ICDF

a. Items with ** indicate comments of particular concern.

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: EDF-2385 (Appendix O)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				versus off-Site disposal (assumed Envirocare) for the ICDF Complex candidate waste streams as was done for the OU 3-13 Feasibility Study Supplement, which the OU 3-13 ROD is based upon. Also, this EDF is to meet the commitment in the OU 3-13 ROD to periodically evaluate the cost of on-Site (ICDF) versus off-Site disposal.
95.	Section 5, 1st para.	19	** It is important to separate out the costs for excavation, packaging and transportation that would occur at each specific source area from the additional costs for off-site shipments. There should be no closure and post-closure costs associated with off-site transport if wastes are managed concurrent with the source-specific excavation operations.	No change to text - There are no costs included in this EDF for the excavation, packaging, and transportation to the ICDF Complex. These costs would occur whether the ICDF Complex exists or not. In addition, transportation to the ICDF Complex would be via truck not railroad. The cost of transportation via truck is 6.25 times of cost of using the railroad for disposal at an off-Site facility (assumed Envirocare). In addition, without the decontamination facility, there would be an addition cost of $300 per truck at the end of the job for decontamination and release (from Envirocare contract). Also there would be some additional costs for development/ reclamation of the loading staging and loadout areas for off-Site disposal without having a centralized loadout facility. Strictly considering the cost of transportation and removing all capital (design, construction, & management), closure (deactivation and management), and only considering the packaging and off-Site disposal with transportation via truck (without decontamination charge), the cost of off-Site

a. Items with ** indicate comments of particular concern.

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: EDF-2385 (Appendix O)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				disposal is $648M compared to $674M. With the reduction of $26M, the ratio between off-Site and on-Site (ICDF) is still 7.5 to 1. If transportation would be via railroad to the off-Site disposal facility, there would again be the expense of off-loading the trucks from the excavation and loading the rail cars. This was the concept for considering a centralized facility. In addition, there would be the added cost of monitoring at several locations versus one location along with the other costs that come from operations at any area. From this, it can be seen that a centralized operation (loadout) facility is less costly and more effective from an operational perspective. Also, the increased number of shipments of waste (trucks versus railroad trains) will result in a higher potential for accidents and other risk issues associated with shipments of waste.
96.	Section 5, 4th para.	19	The assumption that off-site disposal requires a centralized processing facility rather then management at the specific source area requires further justification	No change to text - See response to Comment #95.

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: EDF-2385 (Appendix O)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
97.	Table 4	22	The costs are measured in 2001 dollars vs. Table 3, where the costs are measured in 2002 dollars. A standard comparison year should be selected, which can be done by adding another table with escalated dollars.	Text change - There are typographical errors presented in Tables 4 and 5. The cost estimates were prepared based on 2002 dollars (not 2001 as presented), but the information in the table was presented incorrectly. The values presented are the 2002 dollar values. These tables will be corrected (2001 dollars change to 2002 dollars in the column heading) to show the cost estimates in terms of 2002 dollars.

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: Response to Comments (Appendix P-1)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
98.	Response to Comments #5	1-5	** The 1991 FFA/CO is not consistent with the more recent O&M Fact Sheet. The O&M Plan should contain the necessary elements to perform O&M, which includes aspects of the O&M manual, which establishes performance requirements. DISCUSSION: Note: Several document specific comments have already been addressed above, concerning P-1 and P-2 proposed comment resolutions. Other proposed resolutions have been superseded by our comments above. Remaining comments issues are addressed here.	Comment noted. Appendix P-1 will be deleted from the document.
99.	Response to Comments #55	1-18	Since the verification sampling is based on a 'not to exceed' value, generator instructions on how to select an "expected concentration" needs to be clear.	Appendix P-1 will be deleted from the document.
100.	Response to Comments #73	1-21	** As the perched water diminishes as a result of the elimination of the percolation ponds, the issue of whether the source of contamination is a high level waste spill becomes critical to DOE's management options.	Appendix P-1 will be deleted from the document.

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – EPA[a]

DOCUMENT TITLE: Response to Comments (Appendix P-2)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
101.	Response to Comments #20	2-8	** The proposed resolution identifying May 12, 2004 as the enforceable deadline date for submittal of the Draft RA Report is inconsistent with Table 10-1 in the Draft Final.	Submittal of the Draft RA report will be consistent in the RAWP.

a. Items with ** indicate comments of particular concern.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – IDEQ

DOCUMENT TITLE: Previous Responses				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
1.	Draft RA Work Plan Comment #7		Figure 1-2 has not been corrected. Elsewhere in the submittal, e.g., Figure 5-3 in the Operations and Maintenance Plan, this figure has been corrected to read *"truck in-transport area."* Please correct Figure 1-2 for consistency with the text and other plan documents.	Comment will be incorporated.
2.	Draft RA Work Plan Comment #46 (b)		The response does not resolve the comment. The ICDF evaporation ponds are one of two types of Corrective Action Management Units (CAMUs) that remain subject to the 1993 CAMU regulations, as described in 67 FR 3003. Therefore, in accordance with 58 FR 8666, Land Disposal Restrictions (LDRs) must be met for any remediation wastes that are land disposed after they are removed from the ICDF CAMU. However, if treatment in the CAMU results in contaminant concentrations that comply with applicable land disposal restriction treatment standards, no further treatment prior to land disposal is required as a condition of the LDRs. Text in the RAWP, Section 9.2, Page 9-4, First Paragraph, Last Sentence must be revised accordingly. The requirement specified in 58 FR 8666 should be identified as a "Regulatory Requirement" in Procedural Overview 4.6.5, which addresses cleaning of the Evaporation Pond Sumps.	DOE-ID agrees that LDRs must be met. The following sentence will be added to the end of the first paragraph: "In addition, any sediments removed from the evaporation pond will have to meet the substantive requirements of 40 CFR 268.48."

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – IDEQ

DOCUMENT TITLE: Previous Responses				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
3.	Draft RA Work Plan Comment #68		The revised text in RAWP Section 9.1, Page 9-2 does not fully address the issue. Areas within the SSA that are currently storing wastes must continue to be designated as "storage areas," unless those stored wastes are removed, and the substantive requirements of unit closure (40 CFR 264.111) are met. The revised text does not state that stored wastes must be removed, nor is the appropriate ARAR cited for closure of the storage area prior to creating a new remediation waste staging pile at the same location. Please modify the text to include these requirements. Additionally, the fourth bullet on page 9-2 states, *"the Agencies would be notified in writing that the above steps had been completed and the SSA future waste staging area was functioning as a staging area in accordance with 40 CFR 264.554."* Closure of a storage unit must include an Agency review and approval process, not just a notification that the USDOE believes they have completed the substantive closure requirements. The documentation of closure activities and subsequent Agency approval could be handled efficiently through exchange of letters and attachments.	The workplan will clearly identify staging vs. storage areas in the SSA. Waste currently in the SSA will remain in a storage area. Subsequent changes to staging and storage areas will be made through the revision of the ICDF RAWP (a FFA/CO primary document). The final RAWP will document that all waste has been removed from any portion of the SSA that will serve as a staging area and will document that there have been no spills or that any spills have been cleaned up. This information will serve to document closure of that portion of the SSA as a storage area and will allow that area to function as a staging area. Text will be changed accordingly. Based on the January 23, 2003 Agency conference call, the maximum stored inventory will be provided in the ICDF RAWP.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – IDEQ

DOCUMENT TITLE: Previous Responses				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
4.	Draft RA Work Plan Comment #78		The revised text in Appendix A Section 4.9.5.1, and Appendix A, Sub-Appendix A, Procedural Overview 4.9.5.1 does not fully address the issue. As currently written, these sections have no upper limit on the length of time that wastes may be held in an "in-cell interim area" prior to permanent placement. The IDEQ is willing to allow temporary in-cell set-aside of large waste items within a given work week, for purposes of accumulating enough soils to effectively compact around the item. However, by the end of the work week in which the waste entered the landfill, it must be permanently placed.	Comment will be incorporated – a time frame of 7 days will be added to the section.
5.	Draft RA Work Plan Comment #85 (a)		As discussed in the comment resolution meeting in October, 2002, in order to utilize the exemption found in 40 CFR 264.1 (g), the RAWP should provide documentation that the exempted sump(s) are to be used for emergency use only. Routine inspections should confirm that no liquids are present in these sumps, and the plan should specify that any liquids found in the sump will be removed within a very short timeframe. If this information supporting use of the referenced exemption is elsewhere in this document submittal, please identify the location(s).	Language will be added to state that the sump • Is for emergency use only • Will have regular inspections to determine whether liquids are present • Removing liquid will be a priority and occur within 72 hours of discovery.
6.	Draft RA Work Plan Comment #87		The correction indicated in the comment resolution was not done. Please change the citation to 40 CFR 264.304 (a)-(c).	The citation will be corrected.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – IDEQ

DOCUMENT TITLE: Previous Responses				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
7.	Draft RA Work Plan Comment #99		The response indicates "*HEPA filter testing and filter change-out will be performed in accordance with Section 10 of ASME N510, or an equivalent standard, subject to concurrence by the FFA/CO agencies.*" However, the RAWP does not provide an equivalent method for review and approval. Therefore, no method other than that outlined in Section 10 of ASME N510 may be used pursuant to this RAWP.	The reference to an "equivalent standard" will be deleted. If, at some time in the future, another method is developed, the RAWP will be modified to include the appropriate method.
8.	Draft RA Work Plan Comment #114		The IDEQ does not agree with the proposed use of a fixative for a duration of up to 90 days in lieu of a cover for bulk wastes located in staging piles. Although a soil fixative may address wind erosion, it will not reduce infiltration of precipitation. The IDEQ agrees that wastes in staging piles can remain uncovered for short periods of time while wastes are being removed for treatment (i.e., during a working day). However, a duration of 90 days (which could include the wettest months of the year) is inappropriate, and could significantly increase the potential for release from the staging area(s).	Language will be changed to: The staging piles will be covered with a tarp or other impermeable material.
9.	Draft RA Work Plan Comment #132		The response to IDEQ Comment #130 does not address this comment. SSSTF RD/RA WP Comment #49 requests that information ensuring that 18 boxes described as containing soil and debris meet the requirement that they contain greater than 50 percent debris; this requirement for application of the debris treatment standard is outlined in 57 FR 160. The list of boxes in question for Comment #49 have the following barcodes: 93-617, 96-129, 98-XX1, 15865K, 15866K, 15869K, 15871K, 15872K, 15873K,	This section of the document has been deleted. However, a statement will be added to Section 4.4.4 which requires all debris entering the treatment process to meet the definition of debris in 40 CFR 268.2.(g).

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – IDEQ

DOCUMENT TITLE: Previous Responses				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
			15675K, 15876K, 93-663, 93-686, 94-137, 94-140, 94-179, 94-246, and 94-435. SSSTF RD/RA WP comment 50 questions why boxes with barcodes 93-543, 93-555, 93-610, 93-635, and 93-641 are being proposed for debris treatment. The waste description of these five boxes indicates that they contain only "soil." Comment #50 requests information demonstrating that the wastes in these boxes meet the definition of debris (40 CFR 268.2) and that they contain greater than 50 percent debris. On the basis of the current information, the IDEQ cannot concur that the wastes in these boxes should be treated as debris. If the USDOE still intends to treat these boxes as debris, please provide the requested information. If the requested information does not exist, then each of these boxes should be opened and visually inspected as part of the verification process to ensure that the above requirements are met prior to their treatment as debris. SSSTF RD/RA WP Comment #48 is concerned with boxes for which barcodes had worn off, and uncertainty exists regarding the box content. Again, if there is insufficient data to conclude that the boxes in question meet the debris treatment standard requirements, then those boxes should be opened and at least visually inspected during the waste verification process.	

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – IDEQ

DOCUMENT TITLE: Previous Responses				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
10.	Draft RA Work Plan Comment #197		The detection monitoring criteria at point of compliance wells can not be a moving target. Once background concentrations are established, they are set for the point of compliance wells. Because the statistical approach in 40 CFR Subpart F is based on background concentrations, only the upgradient data would be allowed to be added on a periodic basis. Therefore, once the facility is in operation, the pooling of all data is not consistent with the regulations. Please clarify the text in Appendix H, Section 2.4 to state that only data from upgradient wells will be pooled to determine new control limits.	Section 2.4 will be revised to (1) state that once the ICDF is operational, only additional monitoring data from the upgradient wells will be pooled to determine new control limits and (2) clarify that re-evaluation of control limits will not be performed after every sampling event. As currently stated in Section 2.3, the control limits will be re-evaluated every two years. As presented to the Agencies, all wells, including the upgradient well, are located within existing plumes from INTEC facilities.
11.	RA Work Plan Comment #200		The text in Appendix H, Section 2.5 does not resolve the comment. The approach described therein for re-sampling does not comply with the requirements of Subpart F, nor is it consistent with detection monitoring programs implemented at other similar facilities in Idaho. Subpart F regulations do not provide a mechanism for a facility to re-sample to verify a statistically significant detection. The option to re-sample described in 40 CFR 264.98(g), occurs after the facility has collected Appendix IX samples and is making a determination as to which additional constituents are required to be added to the monitoring program. The IDEQ has allowed facilities to conduct a single re-sample event prior to implementing 40 CFR 264.98 (g) (2), because of variations in aquifer characteristics and the fact that many laboratories in Idaho are not EPA certified. During the single re-sample event, the IDEQ has allowed an operator to collect two (2) samples at the same time	Accept. Text will be modified to indicate that any validated statistical exceedence will be investigated and include notification to the Agencies. The investigation will include resampling for the statistically significant exceedance or notification of the intent to make a determination of the source of contamination is not the ICDF Complex. For resampling, DOE will collect two samples for the contaminants that were statistically exceeded. If two resamples are both not exceedances, then DOE resumes detection monitoring. Otherwise, DOE will notify the Agencies and take appropriate actions to determine the source of contamination. A report will be prepared and submitted to the Agencies within 180 days of making the notification to take appropriate actions.

ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – IDEQ

DOCUMENT TITLE: Previous Responses				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
			(purging between samples), with the understanding that if either sample confirmed the detection, the facility was to proceed to compliance monitoring. However, under no circumstances has a second re-sampling event been allowed. The re-sampling plan described in Section 2.5 in Appendix H must be modified to allow for a maximum of one (1) re-sampling event to confirm an exceedance. If the statistically significant exceedance is confirmed, then the ICDF must sample for Appendix IX constituents in compliance with 40 CFR 264.98(g).	

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – IDEQ

DOCUMENT TITLE: RAWP, DOE-ID-10984				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
12.	Section 2.3.2, 1st para., last sentence	2-5	Section 4.2.4 is referenced for waste tracking during storage. The referenced section 4.2.4 is titled "Waste Packaging and WAG Staging" and states that waste may be staged at the remediation site, but there is no waste tracking information in this referenced section. Please correct this reference.	Reference will be changed to 4.1.6 – Inventory Tracking and Compliance Limits.
13.	Section 4.2, 1st para.	4-6	The text states, "*Waste verification and QA will be the responsibility of the ICDF Complex.*." This seems contrary to the most recent approach outlined in Appendix D, where the generator performs some of the verification. The RAWP text should be revised for consistency with Appendix D regarding the responsibilities and duties of the Complex versus the generator.	This sentence is in agreement with the revised verification plan in Appendix D (as of 1/15/03), so does not need modification.
14.	Section 4.4.2, Last para., 8th sentence	4-10	Please see Comments #3 and #21, respectively, for requirements for closing storage areas and remediation waste staging piles.	Please see Comment #3.
15.	Section 4.5.5, 1st para.	4-14	This paragraph states that prior to release by the RCT, the tailgate area, rear of the vehicle, and rear tires of any vehicle off-loading waste will be surveyed for contamination. It would seem prudent to survey the front tires of the vehicle as well. This comment applies to all sections of the document where similar vehicle release requirements are stated.	Text will be changed to include the front tires.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – IDEQ

DOCUMENT TITLE: RAWP, DOE-ID-10984				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
16.	Section 4.6.2, 1st sentence	4-15	This sentence states that leachate will be transferred **between** the landfill sumps **and** the evaporation ponds. Please replace the term "between" with the word "from," and replace "and" with "to."	Comment will be incorporated.
17.	Section 5.1.1, Table 5-1	5-2	Please add the following to the table: 1. All applicable radiological signs and barriers in place. 2. All applicable traffic control signs in place. 3. All applicable perimeter fences, gates, locks, and signs in place.	Items will be added to Section 4 – Equipment and System Readiness.
18.	Section 5.1.1, Table 5-1, Item 4c	5-4	Please identify the SSSTF "systems" to be addressed by this Equipment and Readiness review.	Scales, admin facilities, computer hookups – tracking systems, alarm systems. Items listed will be added to text in parenthesis.
19.	Section 5.2, Table 5-2	5-8	a) Please add the requirement for weekly inspection for animal intrusion (tracks, burrowing) to the sections for ICDF Complex, ICDF Landfill, ICDF Landfill Crest Pad Building, Evaporation Ponds, and Evaporation Pond Crest Pad Building. b) In addition, please add a weekly inspection for visible damage to the evaporation pond HDPE liners and the inspection for foreign debris to the Evaporation Pond section.	a) Comment will be incorporated. b) Comment will be incorporated.
20.	Section 6.1, 2nd bullet	6-1	A groundwater elevation map should be generated for each monitoring event. In lieu of comparing direction and gradient before and after start of landfill operations, these maps need to document potential trends in groundwater flow direction to verify the adequacy of the monitoring network.	Accept. Text will be modified.

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DOCUMENT TITLE: RAWP, DOE-ID-10984				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
21.	Section 9.1, 4th para., last sentence	9-2	Closure of a remediation waste staging pile unit must include an Agency review and approval process, not just a notification that the USDOE believes they have completed the substantive closure requirements. The documentation of closure activities and subsequent Agency approval could be handled efficiently through exchange of letters and attachments.	Please see Comment #3.
22.	Section 9.1, last bullet	9-3	The Agencies should discuss and concur on the appropriate verification sampling to document that contamination has been removed, in support of the SSSTF closure.	At the time the Closure Plans are developed, the Agencies will have the opportunity for review and concurrence. No change to document.
23.	Section 10, Table 10-1	10-1	The list of target dates should include the submittal of the soil treatment system mixer design and associated operating procedures. It is our understanding that the USDOE plans to do this through modification of the SSSTF RD/CWP and the ICDF Complex RAWP.	USDOE plans to modify the SSSTF RD/CWP and the ICDF Complex RAWP to address mixer design and associated operating procedures. Target dates for these two modifications will be added to Table 10-1.

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
24.	Section 1.3.1, Item 12	1-21	Note that if the ICDF has received waste, the inspections following significant storm events should occur regardless of holidays or "planned cessation of operations."	Text will be changed to read "within 24 hours".
25.	Figure 1-9, Step 2	1-22	Step 2 indicates that waste receiving consists of inspecting the profile and weighing; this is contradictory to Section 2.2.6, which states: *"As the volume of the waste will be recorded in gallons, the load need not be weighed."* Please provide the necessary correction.	A bullet c. will be added to Page 1-21, Section 1.3.2, that says "Liquid wastes received at the ICDF Complex will be measured in gallons and will not require the load to be weighed."
26.	Section 1.3.2	1-21 through 1-23	Please identify the documentation and tracking system for managing a tank or truck if it is not 'free released' due to radiological contamination.	None required for containers or trucks that will be reused. No text change.
27.	Table 3-8, 3rd item, 3rd column	3-31	There must be monitoring under the detection monitoring program. Under CFR 264.98 regulations, a facility is required to monitor for the detection of a potential release from the landfill. The OU 3-13 ROD (page 12-22) states that a detection monitoring program will be met by developing and implementing a facility monitoring plan specific for the ICDF during remedial design. Please modify the third column of this table to identify the detection monitoring requirement.	Accept. Text will be modified to indicate groundwater monitoring will be conducted in accordance with 40 CFR 264.98.

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
28.	Section 3.9, last para.	3-28	The text states that the stormwater collection/trench system will be surveyed twice within the first year of operations. It would be reasonable to survey these ditches annually for the life of the landfill operation. Doing so would identify whether the "good housekeeping practices" are maintained or whether they degrade in subsequent years.	Comment will be incorporated.
29.	Section 3.10.5, 1st sentence	3-39	The current agency-approved QAPP is the DOE/ID-10587 Revision 7 September 2002 version. Please use this reference throughout the RA work plan submittal.	Comment will be incorporated.
30.	Section 4.3.2	4-7 through 4-9	The generalized information provided in this section and in Procedural Overview 4.3.2 is of insufficient detail to evaluate this critical remedy component. A complete design and a sufficiently detailed procedural overview must be submitted as modifications to both the RD/CWP and this RAWP.	The design of the soil treatment system will be submitted as a revision to the SSSTF RD/CWP. The RAWP will also be revised to include the new procedure overviews based on the new design. The current overviews will be removed from the document.
31.	Section 4.1.6.2	4-4	The presence of ICDF personnel at the dig face does not ensure the absence of free liquids at the disposal site. Separation of an aqueous phase from the soil or infiltration of liquids into a container or pile during staging/storage could result in the presence of free liquids at the ICDF. Loads with high soil moisture contents and staged/stored loads should be checked for free liquids at the ICDF.	Guidance will be developed for personnel at the dig site to make sure free liquids are not present in the waste at the time of loading. For waste having high soil moisture, field-testing, additional absorbent may be added, or the load will be checked at the ICDF prior to disposal. This should ensure that free liquids are not disposed in the ICDF landfill. As discussed during the January 16, 2003, Agency call, the procedure requirements for field-testing of free liquids were added to the RAWP and also discussed in the verification SAP.

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
32.	Section 4.3.5, 6th bullet	4-11	Please clarify why a two-step pouring of the grout is planned. Also, please identify how it will be ensured that the grout will harden overnight.	The idea of two pours is to fix the contamination in the grout and to prevent overtopping of the grout during the first pour. Later, a second pour will be implemented to fill the remainder of the box. It is not critical that the grout be totally cured prior to the second pour. Letting the grout set up overnight will allow sufficient time to provide the necessary base for the second pour. No text change.
33.	Section 4.3.10, Item 4	4-13	Please clarify this statement. From the preceding paragraph, it appears that each batch discharged from the mixer unit will be sampled, and that about 5 of these samples will be composited for a roll-off container. Depending on the number of roll-off containers, there may be several composited samples (composites of sub-batches), will these composites then be all mixed together to run the analytical tests?	Item #4 will be replaced with the following language: Finally, a composite sample will be collected from the last two containers of each treatment campaign.
34.	Section 4.3.10, last para.	4-13	Please clarify that if a set of samples fail and there are containers that have been filled prior to the failure determination, that those containers have not already been placed in the landfill. Please identify the process to retrieve these containers if they have already been disposed.	There will be no disposal in the landfill until samples results are received and accepted. No text change.

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
35.	Section 4.4.2, 1st para., Item 1 NOTE	4-14	Since the mixer design and detailed remedial action procedures have not yet been provided to the Agencies for review, the IDEQ cannot evaluate the referenced statement regarding the representativeness of a surface sample for post-treatment testing. Therefore, the IDEQ does not concur with the referenced statement at this time.	Once the mixer design has been revised, the RAWP will be revised to include necessary changes. Referenced language will be deleted.
36.	Section 4.6.5	4-17	Please clarify how and when the level of sludge buildup will be determined.	A combination of operating knowledge and visual observation will be used to determine the approximate 12-in. depth of sludge that triggers sump cleanout. This accumulation and subsequent cleanout is not expected to occur very frequently. This information will be added to the procedure overview.
37.	Section 4.9.5.1, list of bulleted items	4-22 through 4-23	Please see Comment #4 regarding any use of an in-cell "interim area."	See response to Comment #4.
38.	Section 4.9.5.3, list of bulleted items	4-24	Please see Comment #4 regarding any use of an in-cell "interim area."	A statement will be added to the second bullet that says "Waste may not be staged in the landfill longer than 7 days waiting for placement."
39.	Section 4.9.5.3, 6th bullet	4-24	A compaction test using a nuclear density gage should be performed every 2,500 cubic yards as a minimum. The stated 5,000 cubic yards is roughly equivalent to 500 dump trucks of soil. Given the critical role of the landfill cover to minimize infiltration, excessive subsidence of the landfill must be prevented. This comment also applies to the Waste Compaction and Inspection procedure.	Comment accepted. Language will be changed to reflect 2,500 yd^3.

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
40.	Section 4.9.5.3, 6th bullet	4-24	IDEQ does not reject the proposed use of the Humboldt GeoGauge, but use of this device versus the nuclear gage for compaction verification requires further evaluation and discussion by the Agencies.	Comment noted. Based upon discussions with the Agencies January 8th and 9th and the supplemental information regarding the use, the GeoGage may be used to determine whether acceptable compaction has been achieved. This section and the procedure overview will be revised to include additional information about its use at the ICDF. The Agencies will be provided the information for review and approval.
41.	Section 5.1.3, list of bulleted items, 7th bullet	5-6	The seventh bullet states that adequate run-on/run-off control is provided. However, the design for the staging and storage does not include any type of berm or protective dike. As the base material includes sloped compacted gravel, there is the potential for contaminated run-off from the staging and storage area to impact the clean subsurface soils. There should be a berm or protective dike around the bulk soil staging area, the tank and container storage area, and the contaminated equipment storage area to prevent any contaminated run-off from migrating off and potentially impacting the porous subsurface.	A new design will be provided, which will include the following key points: Soils in the remediation waste staging pile are to be managed in a manner so as to eliminate any potential run-off from coming onto the soil staging pile, or run-off from contacting the soils, thus eliminating the need to contain runoff. To achieve this, the following will be observed: • The soil pile shall be placed on an impervious liner. There will be at least a 2% slope away from the soil pile to ensure proper drainage. • Bottom liner material for the soil pile shall be of sufficient strength/design to withstand the planned staging and subsequent removal of soils. The technical specifications will be established in an EDF (to be prepared) that will include requirements

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Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				for base material and equipment restrictions, if necessary. • The liner will extend at least 5 ft beyond every edge of the soil pile. • An impervious manmade material (cover) shall be used to cover the soil piles at all times that the soil is not being actively managed (placed, sampled, or removed). The cover shall extend beyond the bottom liner. The cover shall be secured so as to ensure that the staging pile soils are not exposed to the wind, precipitation, or elements. • The cover shall be an impervious material that will be sufficient to withstand the site conditions (sun, cold, heat, wind, and movement to expose/cover the working face). The waste will not be actively managed during inclement weather (e.g., periods of precipitation, high winds). The working face and liner with waste soils will be covered at the end of each workday. In addition, the following requirements will remain: • Retain the previous information (as applicable) that addresses the impervious cover and liner - no seams or welded seams per factory specs • Timeframe of soil pile – operate for up to 24 months per waste stream

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				• Closure after removal of waste stream – documentation of removal of contamination, elimination of threat of release; management of any waste generated.
42.	Section 5.2.2, 5th bullet	5-7	Additional language should be included that describes the HPDE liner under the concrete slab.	The secondary containment system is detailed in the SSSTF RD/CWP. A sentence will be added that a liner is present.
43.	Section 6.2.5	6-3	Wetting of any portion of a HEPA filter will weaken that filter. If wetting is suspected the filter should be replaced. Please modify the text accordingly to include the criteria.	The following sentence will be added at the end of the section: "If wetting is suspected, the filters will be evaluated and replaced as necessary in accordance with INEEL procedures."
44.	Section 7.7	7-4	A problem encountered regarding training records/documentation in recent agency inspections of the INEEL facility was the lack of ability to tie the position description/title of a particular person to the training records. For example, if John Doe is an Operator A, the normal reporting only shows that the Operator A's position is to have "X" training. John Doe has his personnel-training list but there is no crosstie that this covers the 'Operator A' requirements. The ICDF records should provide this cross-reference.	The individual training plan identifies the requirements for the position. Records will be maintained on-Site that identify the position description/title and the individual(s) performing that function.

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
45.	Section 9.2.1, 3rd para., #3	9-3	See Comment #11. In the event of an exceedance and confirmation, the regulations are very clear that the facility must sample for Appendix IX constituents or make a determination under § 264.28(g)(6) that a source other than a regulated unit caused the exceedance. A facility can not detach itself from Subpart F requirements in order to investigate groundwater issues. If a facility wants to investigate the cause of the exceedance, they must also comply with the appropriate § 264.98 or § 264.99 regulations while the additional investigation is proceeding.	Accept. The details on actions following an exceedence have been moved to Appendix H. Text will be modified in Appendix H. See response to Comment #11. In Section 9.2.1, third item, the following sentence will be deleted: "This investigation, any required compliance monitoring or any follow-up corrective action(s) will not be part of the detection monitoring program but will be covered under a separate plan." The last sentence of this paragraph will be revised as follows: "... initial Appendix IX analysis will be added to the existing analytical list for compliance monitoring."
46.	Section 9.2.1, #5	9-4	DEQ cannot concur with the speculative nature of this paragraph. In the event the detection monitoring criteria is exceeded, the Agencies would set the Groundwater Protection Standard(s) in accordance with 40 CFR 264.92. Therefore, the need to discuss alternate concentrations limits in this document is premature. Item 5 should be deleted.	Accept.
47.	Section 9.2.1, Item 6, 2nd para.	9-4	The citation for the sentence *"In making a demonstration under 40 CFR 264.98..."* must specify 264.98(g)(6).	Accept. The details on actions following an exceedence have been moved to Appendix H. Text will be modified in Appendix H.

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
48.	Section 10.6.4	10-8	The text should clearly state that the term *"Operations Records"* as used in this section is not the same as the *"Operating Record"* as defined by 40 CFR 264.73. The text should describe how the substantive requirements of 40 CFR 264.73 will be met. If this information has been presented elsewhere in the RAWP submittal, please identify the location.	40 CFR 264.73 is not an ARAR. The requirements listed in 40 CFR 264.73 are administrative and do not apply to the ICDF Complex. The records outlined in Sections 4.1 and 6 of the RAWP will be maintained. Also, the environmental monitoring and recording keeping detailed in Section 3.9 of DOE/ID-11000 will be maintained as required by the FFA/CO. Language will be added to clarify that "operating records" in the regulations are not the same as "Operating Record" in this plan.
49.	Sub-appendix A, Overviews 1.2.3.2, Section 5	1-2	Please describe how the fluid levels and the immiscible layers will be measured.	The text will be revised to indicate an oil/water interface level indicator or a semi-clear bailer will be used.
50.	Sub-appendix A, Overviews 1.2.3.2, Section 5	1-2	Please clarify which inspection report would measure or track the buildup of the oil and sludge layer in the oil/water separator.	This will be added to the decon building inspection report.
51.	Sub-appendix A, Overviews 4.3.2	1-3 of 3	The generalized information provided in this Procedural Overview is of insufficient detail to evaluate this critical component. Therefore, the IDEQ does not concur with this remedial action component. A complete design and a sufficiently detailed procedural overview must be submitted to satisfy the remedial action work plan component. See Comment #23.	See response to Comment #23. Overview will be deleted and the information regarding the design of the treatment unit will be submitted in a revision to the SSSTF RD/CWP. The procedures for operation will be developed and included as a revision to the RAWP.

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
52.	Sub-appendix A, Overviews 4.3.5	1 of 3	Please describe how it will be determined that the grout has sufficiently cured prior to disposal.	Grout curing times will be determined based on the required mockup of the process. Once these have been determined, a table outlining curing times will be developed and included in the appropriate procedure. No text change.
53.	Sub-appendix A, Overviews 4.3.8, Section 5, 1st bullet	2 of 2	Please include language stating that the driver will verify that the bar code on the container matches the information on the OWTF.	Language will be added to state that Waste Generator Services or the driver (if WGS is not present) will verify the bar code on the container matches the OWTF.
54.	Sub-appendix A, Overviews 4.3.8, Section 5, 5th bullet	2 of 2	Please include language that indicates the OWTF data will be entered into the tracking system before the end of the next business day.	Comment will be incorporated.
55.	Sub-appendix A, Overviews 4.6.3, Section 4, 1st bullet		An additional, larger capacity pump should be included for rapid liquid transfers. A one-hundred (100) GPM capacity appears to be too low to move enough water in a reasonable time period for emergency situations. Please describe provisions for additional pumping capacity if a rapid transfer is required.	The 100-gpm capacity of the transfer pump is believed to be more than adequate, even in emergency situations. No text change.

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
56.	Sub-appendix A, Overviews 4.6.5, Section 3	1 of 2	Please see Comment #2 for regulatory requirements of wastes excavated from this CAMU.	Please see response to Comment #2.
57.	Sub-appendix A, Overviews 4.6.5, Section 5, 1st bullet	1 of 2	Sediment should be tested for LDR compliance any time sludge is removed from pond. Please modify the text accordingly.	See response to DEQ Comment #2. The text will be modified accordingly.
58.	Sub-appendix A, Overviews 4.8.1	1 of 3	Please verify, and correct as needed, the ALR for the landfill. It is stated as 1,590 gallons/day in the fourth bullet under Section 1. Previous documents (EDF-ER-269) indicate an ALR for the landfill of 1,380 gallons/day.	The correct ALR for the landfill (both cells) is 1,380 gallons/day and the correct ALR for the evaporation pond is 1,590 gallons/day for each pond cell. The overview procedure will be corrected.
59.	Sub-appendix A, Overviews 4.9.5.1	1 of 6	Please see Comment #4 regarding any use of an in-cell "interim area."	Please see resolution to Comment #4. The overview procedure will be consistent with this resolution.
60.	Sub-appendix A, Overviews 4.9.5.1, Section 5	2 of 6 6 of 6	Please describe the moisture ranges, types of grouts (range of options), and how the grout will be pumped.	Text will be added to indicate that Type II Portland Cement will be used. Also a max water content/cement ratio will be added.

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
61.	Sub-appendix A, Overviews 4.9.5.3, Section 5, 2nd bullet	2 of 2	More detail should be added to indicate the location and depth of the test or tests; the referenced standards do not specify depth or other parameters of interest.	Testing will be performed in accordance with the manufacturer's recommendation and ASTM standards. Language will be added to state that the testing will be done in the upper 12 in.
62.	Sub-appendix A, Overviews 4.10.2, Section 5	3 of 3	The overview should indicate that cable ties will be installed to secure power cable and transducer to the pipe.	Comment will be incorporated and overview procedure will indicate that cable ties will be installed.
63.	Sub-appendix A, Overviews 4.11, Section 5, last bullet	2 of 3	We suggest that the overview reference the drawing that shows the locked gate at or around the evaporation pond.	A reference to the drawing that shows the fence and gate around the evaporation pond will be included in the overview procedure.
64.	Sub-appendix A, Overviews 4.12.5, Section 5, 3rd bullet	1 of 2	It would be practical to add a step that provides erosion protection at the end of the discharge pipe at the stormwater runoff ditch location.	Comment will be incorporated. The third bullet will be modified to read: "Lay temporary piping on the surface of the operations layer from the sump location to a storm water runoff ditch outside of the landfill berm. Provide erosion protection at the end of the discharge pipe in the storm water runoff ditch. Install the sump pump and generator, if needed."

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
65.	Sub-appendix A, Overviews 4.12.6, Section 5, 3rd Item, 1st bullet	2 of 2	Since the quantity of water used for compaction and dust control is not measured, how will a review of "trends in operational use of water for compaction and dust control" be conducted?	Language will be added to state that visual inspections to avoid free-standing liquid will be performed.
66.	Sub-appendix A, Overviews 5.1, Section 5	2	In the Implementation section, it states that the liner material for the staging pile area could be 30-, 60-, or 100-mil thick HDPE, with or without a geosynthetic cushion. Please describe what precautions will be taken to ensure that the geomembrane will not be damaged by loading and unloading and/or other waste management operations.	An EDF will be developed to identify the equipment and the liner requirements. This will be included in a later modification to the RAWP.
67.	Sub-appendix A, Overviews 5.1, Section 5, 2nd bullet, 4th Item	2 of 7	The Overview or O&M plan documents should identify how the size of the low point capacity was determined. Is it able to contain a 24-hour 25-year storm event? Are inspections for these low points included in the weekly inspections for the Staging Pile?	The design of the staging piles will be modified. There will be no berms or sumps to catch the storm water within the staging pile. Language will be modified. Please see IDEQ Comment #41.

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
68.	Sub-appendix A, Overviews 5.1, Section 5	5 of 7	A section should be added on decontamination and release of equipment used in the piling of contaminated soil in the staging area. This comment also applies to the equipment used to load the material.	Language will be added to state that: "The Site-wide survey criteria to release a piece of equipment will be utilized." Decontamination methods will follow the same protocol of techniques discussed elsewhere in the document ranging from dry wiping through moving the equipment to the decon bay for wet decontamination methods. Language will be added to the overview regarding decontamination, and checks of contamination spreading from the staging area.
69.	Sub-appendix A, Overviews 5.1, Section 5, 1st para.	5 of 7	Please clarify that the containers to be filled are "boxes" that will fit into the tripper in the treatment process.	A statement will be added that says "The boxes to be used must be of a size to fit the tipper unit of the treatment unit."

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
70.	Sub-appendix A, Overviews 5.1	6 of 7	See Comment #21 regarding requirements for staging pile closure. Also, please provide details on how equipment used in the staging pile area will be decontaminated.	For staging piles to be closed in the future, the ICDF RAWP will be modified to provide the basis for closure and the drawings adjusted accordingly. Approval of this modification will then be in accordance with the FFA/CO for changes to a primary document. The following information will be added to the end of Section 5 to address equipment decontamination. This information will not be part of the closure bullets, as decontamination will not necessarily be performed between waste streams. "Equipment used during the bulk staging of soil wastes will be decontaminated when necessary. Decontamination is necessary when the equipment will no longer be used for dedicated operation at the bulk soil staging area, when contamination levels on the equipment compromise the health and safety of the equipment operator, or when contamination levels on the equipment could contaminate surrounding clean areas. Decontamination will be performed by first using dry decontamination methods. If unsuccessful, wet decontamination will be performed in the decon building. Decontamination methods will be based upon the contaminants present in the bulk soil stockpile staging area."

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
71.	Sub-appendix A, Overviews 8.2 & 8.3, Section 5, Landfill Cell Bullet, Item 8	2 of 5	The inspection should include observations of whether the dust fixative is providing adequate coverage.	Comment will be incorporated. In Section 5 of the referenced overview, under the bullet "Landfill cell", the following bullet will be added: "Is the soil fixative providing adequate dust suppression on the disturbed areas of the landfill?"
72.	Sub-appendix A, Overviews 8.2 and 8.3, Section 5	3 of 5	Monitoring or inspecting for evidence of oil sheen on the water surface should be included as an additional inspection item for the evaporation pond. This could result from overloading the oil/water separator.	Comment will be incorporated.
73.	Sub-appendix A, Overviews 8.5, Section 5, Decon Building Bullet	2 of 3	a) The trench system should be inspected to see if it needs to be cleaned of sediment buildup. b) Please add an inspection item, to check and record oil level and sludge levels in the separators.	a) Comment will be incorporated. b) Comment will be incorporated.
74.	Sub-appendix A, Overviews 8.5, Section 5, Contaminated Equipment Pad Bullet	2 of 3	Please add an inspection item for the trench system to see if it needs to be cleaned of sediment buildup.	Comment will be incorporated.

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DOCUMENT TITLE: DOE/ID-11000 (Appendix A)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
75.	Sub-appendix A, Overviews 8.5, Section 5, Treatment Unit Bullet	2 of 3	Use of a roll-off container with steel wheels under the mixer will likely cause damage to the floor and floor coating. An inspection item should be added to observe the floor area used by the roll off container for damage.	Comment will be incorporated.
76.	Sub-appendix B, Section B-2	B-4	a) Please clarify whether the Hyster Forklift will be used to move the rolloff containers into and out of the treatment area, if so, please add this to Description section. b) Please clarify if a Grout machine or system should be added to this list. This will be the unit to fill the boxes in the decon building, and listed in overview Debris Treatment 4.3.5. c) Please clarify if a mud pump and hoses, etc., should be added to this list. These are listed in P – Trap Overview 1.2.3.1.	a) The forklift will not be used for roll-on/roll-off containers. b) This will be addressed in detail in the RD/CWP SSSTF revisions. c) Items will be added to the list.
77.	Sub-appendix B, Section B-4	B-7	Please clarify whether CAMs will also be used in the Decontamination building.	CAMs will be installed in the decon building as outlined in the SSSTF RD/CWP. No text change.

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DOCUMENT TITLE: DOE/ID-11046 (Appendix B), ICDF Complex Material Profile				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
78.	Section 4.2.2, 2nd para., 3rd sentence	4-2	The referenced text states, *"A methodology shall be developed to accurately document the percent by volume of each item type in the waste."* Please describe, in the text, how this methodology will be developed, the general assumptions used, and how the methodology will be implemented.	The paragraph will be clarified. The "methodology" referenced in this section identifies the methodology to be developed by the generator. The section, read in context, requires the generator to develop a SAP (if one is not developed already), including a methodology that will document the "percent by volume of each type of the waste." Thus, "methodology" refers to the SAP developed by the generator – ICDF will not prepare SAPs for each generator.
79.	Section 5.1.1.3, 1st para.	5-3	The last sentence states that additional testing of a representative sample of the waste stream may be required to clarify that the waste meets a concentration-based treatment standard of 40 CFR 268.49. The text implies that only the soil alternative treatment standards have to be met. As aqueous waste streams may be accepted and used in the treatment process, testing may be required to verify that the non-wastewater treatment standards of the Universal Treatment Standards of 40 CFR 268.48 are met. Please modify the text accordingly.	The text will be revised to clarify that if contaminated water is used then the LDRs for non-wastewater will be applicable.

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DOCUMENT TITLE: DOE/ID-11046 (Appendix B), ICDF Complex Material Profile				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
80.	Section 5.1.2.3	5-6 through 5-7	Please note that if the radioactive waste also contains hazardous waste, the classification and disposal strategy must also comply with applicable RCRA regulations, including the Debris rule. This may refine the strategy described in the bullets. For example, reasonable efforts may have to be made to remove sludges from a basin prior to scabbling the walls. Likewise, if a slab of concrete is being removed, the soils that stick to the concrete do not have to be segregated from the concrete; however, a generator cannot continue to mix underlying (concrete-free) contaminated soils with the surficial soil/concrete mixture to create a larger volume of debris waste.	Comment noted. No text change.
81.	Section 5.2, 1st para.	5-7	For the generator to be able to provide information allowing for the establishment of 95% upper confidence levels for the Material Profiles, the generator will have to have provided analytical data. Therefore, process knowledge cannot be the only basis for the Material Profile.	The paragraph will be clarified. However, Section 5.1.1 notes: ***When a waste designation is based solely on process knowledge, the generating site must ensure that the chemical, physical, and radiological properties of the waste are adequately determined.*** Thus, the generator must provide acceptable supporting data. When these requirements are reviewed in conjunction with the IWTS profile guidance, the requirements for some kind of supporting data for process knowledge are clear. Acceptable knowledge is detailed in the ICDF Complex WAC.

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DOCUMENT TITLE: DOE/ID-11046 (Appendix B), ICDF Complex Material Profile				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
82.	Sub-appendix D, Table D-1 and Appendix D, Waste Verification Sampling and Analysis Plan, Table 2-2	D-3 through D-5 and 2-6 and 2-7	a) Having line items for LDR and key Landfill contaminants of concern (COCs) that state *"100 % visual inspection"* is confusing and adds no value for the individual COC parameters. Verifying that *"the physical parameters of the waste do not differ from those on the Material Profile"*, as stated in the table footnotes, in no way verifies the concentrations for the chemical parameters (COCs) for which they are listed. Neither does it verify that the wastes with those COCs have been grouped in the correct *"percent of the applicable limit* " categories. Presenting use of the visual inspection as currently shown in these tables is misleading because it suggests that the observations somehow verify each of the COC line items. Please modify the tables so that it is clear that the visual inspections are not used to verify the COC line items. The Section text could describe the purpose of the visual inspection, but it should not be linked to verification of the COCs in the wastes. b) Please check the other entries and footnotes for consistency among the two appendices and modify as needed. c) It is also important to note that the ICDF Complex will be unable to compare to the generator's 95% upper confidence level without analytical verification sampling.	The entire sub-appendix D will be deleted from Appendix B. Table 2-2 in the Verification Sampling and Analysis Plan (Appendix D) will be modified and the column for <20% of applicable limits will be removed. The text will also be modified to state that visual inspection is not intended to verify the COC concentrations. A similar change will be made to Table 2-3 for the < 50% category. In addition, as discussed with the Agencies on 1/15/03, Appendix D will be revised to incorporate a discussion on placing waste in the < 20% category (or < 50% for TRU) prior to receipt of all verification results and the assumption of the associated risks by the ICDF. The revised table concerning visual inspection will be provided to the Agencies prior to finalization of the document.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – IDEQ

DOCUMENT TITLE: PLN-914 (Appendix C)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
83.	Section 7.2	18 of 21 (same comment also made for Appendix D)	PLN-314 indicates that the tracking logic for compliance is Accept/Reject only, that is, if the current landfill inventory plus the additional shipment is less than the limit the transaction is accepted. Appendix D, Section 3.3.3 indicates that if key parameters have reached greater than or equal to 80% of the mass-based operational limit, waste will be staged to delay placement until the mass-based limit will not be exceeded. PLN-314 should be clarified to indicate the compliance evaluation will be conducted on a per load basis and acceptance/landfill placement will cease when 80% of the established limit is reached. Alternatively, IDEQ believes that supplemental verification sampling, using the highest tier verification sampling for the parameter/contaminant(s) of concern is necessary to ensure the administrative limit is not exceeded.	(DOE-ID assumes this comment refers to PLN-914.) The PLN-914 will be modified to agree with Appendix D. Therefore, there is no need to implement the alternative suggestion.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – IDEQ

DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
84.	Section 2.7, 5th para., 7th sentence	2-4	The IDEQ does not concur with the proposal that no verification sampling of soils containing I-129 is needed prior to disposal. This contaminant is highly mobile and therefore a major concern for groundwater. I-129 has been detected at two INTEC sites at concentrations near the WAC limit, and represents a potential waste volume from these two sites that approximates at least 20 percent of the total ICDF disposal capacity. Since the stated purpose of waste verification is to confirm that key parameters in the waste do not exceed the limits on the Material Profile, and since the concentrations on the Material Profile cannot exceed the WAC limits, it is necessary to sample for I-129 prior to disposal of these wastes in the ICDF. The Agencies have ensured the public that wastes that do not meet the Waste Acceptance Criteria are prohibited from disposal in the ICDF. Therefore, the Agencies are especially obligated to verify, prior to disposal, those COC concentrations that are at or near the WAC limits.	The verification sampling and analysis plan will be modified to address I-129 verification in accordance with the January 16, 2003, Agency discussions and Margie English email dated January 16, 2003. Basically, I-129 verification will be addressed through the following: 1) Additional characterization of the I-129 curie content will be performed for those sites suspected of having I-129 contamination. Based on existing data, this includes sites that have a likely potential for detectable I-129 (e.g., CPP-36/91, 37B, 67, 97, 98, and 99). 2) This characterization will be described in the sampling and analysis plan that is included in the appropriate RD/RA Work Plan or a modification to the ICDF Remedial Action Work Plan. The characterization will be conducted prior to finalization of the Material Profile. 3) Waste verification for I-129 may be achieved through the characterization effort. Waste verification will be addressed as part of the DQO process in the sampling and analysis plan described above. 4) Based upon the results of the characterization, the concentration guidelines for I-129 may be adjusted

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DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				to coincide with the expected volume of I-129 contaminated soil. According to the ICDF landfill WAC, the limiting factor for I-129 is 2.4 curies. The verification sampling and analysis plan will be revised to indicate the above actions will be performed prior to waste acceptance into the landfill. The revised text will be provided to the Agencies prior to document finalization.
85.	Section 3.1, 1st para.	3-1	The text should identify what the waste specialist is looking for when he checks the characterization documentation.	Text will be modified as follows: The ICDF waste specialist will review analytical data from the waste characterization process against the associated Material Profile prior to approval of the Material Profile.
86.	Section 3.2.1	3-1	The text should specify that the visual inspection will ascertain that the waste contains material that meets the definition of debris as defined in 40 CFR 268.2, and that each waste container identified on the profile as debris includes greater than 50 percent debris. For example, a container holding 90 percent soil with a few pieces of metal in it should not be identified as a debris waste on the profile.	The text will be modified as follows to agree with the definition of debris in 40 CFA 268.2(g): "The visual inspection will ascertain that the waste contains material that meets the definition of debris as defined in 40 CFR 268.2(g), and that each waste container identified on the profile as debris includes greater than 50% debris."
87.	Section 3.3.3	3-3	See Comment #83 regarding compliance tracking.	See response to Comment #83.

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DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
88.	Section 3.3.4	3-3 to 3-5	Under 3.3.4, IDEQ requests removing (and moving, with some edits) the third and fourth paragraph because the paragraphs describe the data that the generator can use to do verification. Instead, Section 3.3.4.1 and Table 3.1 should follow the first two paragraphs. Then, under 3.3.4.2, the description of how the samples are to be chosen and who has to do the sampling can be addressed. a) Under 3.3.4.2, the first paragraph language sent for last week's call (received via e-mail from USDOE December 12,2002) should be added: Representative samples are required for both stages of verification sampling. For verification sampling, a representative sample must be obtained from a probability-based sample design, not through a convenience- or biased-sample design. A representative sample is most easily accomplished via simple random sampling. To implement a simple random sampling scheme for a waste stream, the waste stream must be divided into population units. To obtain the population units, the waste stream must first be divided into lots of size 5000 yd^3. A three-dimensional grid of population units of size 50 yd^3 can then be overlaid on each lot. A random sample of population units can then be chosen from each lot. The number of random samples required for each lot depends on the concentration of the key parameter of interest as shown in Table 3-1. Finally, within each	Section 3 (and other places within the document that reference the "old" plan) will be rewritten to explain the revised verification plan. The summary of the plan follows. Verification is required to confirm that the key parameters in the waste do not exceed the limits on the Material Profile. For soil waste requiring verification sampling, the verification decision will be based on application of the simple exceedance rule. The specified confidence and percentage of waste required to be within the limit will vary, depending on the concentration specified on the Material Profile with respect to the Waste Acceptance Criteria. Those key parameters with concentrations close to the WAC will require greater confidence and percentage of waste within the Material Profile. Verification data requirements (sample size) for waste specified on a Material Profile can be obtained from a revised Table 3-1 (as presented for the 1/15/03 conference call). A process flow chart (similar to the one presented for the 1/15/03 conference call) will be provided in the text to clarify the verification process and define responsibilities. All samples taken after the Material Profile is approved in support of the verification decision will be taken under the direction of ICDF, by WGS personnel. This fact is reiterated in the revised Table 3-1, which no longer specifies a characterization lot sample size

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DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
			randomly selected population unit, a random sample collection location must be chosen. b) The next paragraphs should have the following italicized changes: ICDF users are required to complete stage one of the simple exceedance rule verification based on the sample size requirements stated in Table 3-1. ICDF users may utilize existing data to meet these requirements if the existing data are from samples that were representative of the waste in *the* randomly selected population unit *described above*, were collected and analyzed with comparable methods, and are timely. If sufficient qualified representative samples do not exist for a given lot based on existing data, the ICDF user must collect enough additional samples *from the 3-D grid* to meet the requirements of Table 3-1. To meet the stage two verification requirements, the ICDF waste specialist may rely on additional qualified *(from the randomly selected units of the 3-D verification grid)* representative samples from the ICDF user if they exist. If insufficient samples are available, then the ICDF waste specialist will direct the ICDF samples to take the required number of representative samples *(from the established 3-D verification grid)* to meet the stage two requirements.	separate from a verification lot sample size. The verification sample selection for a given Material Profile will be independent of any characterization sample selection performed by the generator. The maximum size of a lot will be 5000 yd^3. The maximum size of a population unit will be 50 yd^3; the minimum population unit size will be 15 yd^3. Verification sample selection must be flexible to accommodate insitu waste and waste that is or will be containerized prior to verification sampling. However, for each Material Profile, verification sampling requirements will follow one approach; a mixture of insitu and container sampling approaches will not be allowed for a single Material Profile. 1) For sampling insitu wastes, the volume of waste will be divided into lots of size no more than 5000 yd^3 and the population unit will be a maximum of 50 yd^3. If the lot size is less than 5000 yd^3, then the lot will be divided into approximately 100 population units, with a minimum population unit size of 15 yd^3. After being divided into lots, a three-dimensional grid of specified population unit size will be overlain. The required number of samples will be selected from randomly chosen grid cells. Using this sampling approach, data from previously collected samples that fall within randomly selected grid cells can be used if they

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DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
			What IDEQ wants to avoid is the following scenario. An ICDF user characterizes the waste as being 50% of the WAC using a 3-dimensional random sampling grid containing 9 data points. When the ICDF goes into the verification stage, the sample selection design requires a 3-dimentional random verification grid to be generated with 9 data sampling locations. It is extremely unlikely that the verification grid will identify the same 9 blocks as the characterization grid generated. The current write-up could be read to mean that the characterization data set could be used as the verification data set since the characterization data set was generated using a 3-D grid with a random sampling pattern. It makes no logical sense to say that one can verify data set A by looking at data set A. c) Footnote b of Table 3-1 seems to relate to the same issue: If the characterization sample size meets the verification confidence requirements, then additional verification samples will not be required. The ICDF needs to be aware that the size of the characterization sample size has nothing to do with the size of the verification sample size. They are generated separately from each other. The only time they interrelate is if the 3-D verification grid samples happen to be in the same area as the characterization samples were. This	were collected and analyzed using comparable methods and are recent enough that temporal change is not an issue. It is expected that only a few generators will have previously collected sample data meeting these criteria. 2) For sites where insitu waste verification sampling will not be performed prior to excavation, a grid will not be utilized. Rather, a random sample of containers within a lot will be chosen. (A lot being no more than 5000 yd^3 and a population unit size being at least 15 yd^3.) This applies to waste that is or will be containerized prior to verification sampling. If a previously collected sample is available from that container, it can be utilized for verification of containerized wastes. Data from previously collected samples can be used if they were collected and analyzed using comparable methods and are recent enough so that temporal change is not an issue. All verification samples will be required to be representative of the waste in a given population unit. As such, properties of the COC must be taken into account in order to represent the concentration of the COC in the sample (e.g., for previously containerized waste, an auger sample would be taken if any question of homogeneity in that population unit existed). All samples will be collected following EPA-approved sampling methods.

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DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
			footnote should be removed. d) There are a couple of sentences that do not read well because they are separate from each other. As they are in paragraphs that I suggest be either removed or relocated to Section 3.3.4.2, I believe the information can be stated together. The first sentence of the third paragraph under Section 3.3.4 states: Wastes with concentrations for LDR and landfill COC key parameters > 20% of the applicable limit or TRU waste constituents ≥ 50% will be verified by a two-stage application of a simple exceedance rule (EPA 2002). The other waste is not addressed until the fourth paragraph, which could confuse the reader. Also, though the ICDF user may be the one that collects and analyzes these samples, we believe that the ICDF is still the responsible party since this is a verification step: Wastes with concentrations for LDR and landfill COC key parameters < 20% of the applicable limit or TRU waste constituents < 50% will be verified by application of a single-stage simple exceedance rule (EPA 2002). The generator is responsible for collecting and analyzing these samples.	For waste streams larger than 5000 yd^3, the waste stream will be divided into approximately equal size lots as close to 5000 yd^3 as possible. This will be done in order to allocate samples evenly among lots within one waste stream and to maintain a constant population unit size for a waste stream. For example, a waste stream of 7000 yd^3 would be divided into two lots of 3500 yd^3 instead of one lot of 5000 yd^3 and one lot of 2000 yd^3. If the waste stream is small enough that approximately 100 population units do not exist (i.e., the waste stream is less than 1500 yd^3), then the required number of verification samples will be taken from the available population units. If the number of available population units is equal to or less than the required number of verification samples, then each population unit will be sampled. Footnote b of Table 3-1, as presented for the 1/15/03 conference call, will be modified as follows: "A maximum of one sample per population unit will be taken. The maximum size of a population unit will be 50 yd^3; the minimum size of a population unit will be 15 yd^3." The flowchart presented for the 1/15/03 conference call will be modified to: 1) Add a decision box to determine if verification passed with lines to "Is Data Adequate for Material

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DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				Profile?" if verification fails and "Accept Waste into ICDF" if verification passes. 2) Revise decision box "Does previous data meet verification requirements?" to specify that the verification data are independent of characterization.
89.	Section 4.2, 4th sentence	4-1	The referenced text states, *"If the Material Profile indicates that only constituents that can be detected at sufficiently low levels using instruments available at the ICDF are in the waste, then on-Site instrumentation may be used."* Please note that the on-Site analyses must be conducted using standardized, approved analytical methods. It is critical that data collected to support this remedy are defensible. Methods that have not undergone review by the USEPA and/or IDEQ should not be used.	Proposed methods are provided in Section 4 of this document for Agency review.
90.	Section 4.2.1 and Section 4.2.2	4-1 and 4-4	The text states that analytical methods are listed in Table 2-2, but this appears to be the wrong reference. No analytical methods are in Table 2-2. Please correct the reference. Some analytical methods are found in Table 4-1.	Sentence will be reworded to clarify that "The following sections describe the analytical methods that will be used for the various parameter clarifications listed in Table 2-2."

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DOCUMENT TITLE: DOE/ID-10985 (Appendix D)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
91.	Section 4.2.1.1 bulleted items; Section 4.2.1.2 bulleted items; Section 4.2.2.1 bulleted items	4-4 4-4 4-5	Please replace *"similar to"* with *"equivalent or superior to."* It is critical that data collected to support this remedy are defensible.	Comment accepted. Change will be made throughout the document.
92.	Section 4.2.3	4-5	How does an average of 400 mg/kg coincide with the requirement of sampling when the level is greater than 20% of the WAC? Isn't the WAC for VOCs 500 mg/kg?	The cutoff for sampling in support of verification for VOCs is 80% of the applicable limit, not 20%, and 400 mg/kg is 80% of the 500 mg/kg limit.
93.	Section 6.1.4	6-2	Under Comparability, the statement is made that *"comparable data must be obtained using unbiased sampling designs."* The suggested verification approach described in Section 3.3.4 suggests that characterization data be used before using the 3-D grid and random sampling method. This method is not unbiased.	No change to document required, since the verification plan will be modified (see response to EPA Comment #59) and there should be no concern that the data were obtained from a biased sample design.
94.	Section 10.2.3, last bullet	10-2	Please provide a reference to how and when field audits are to be performed.	Comment rejected. Issue is just that the results of any audits will be documented in the logbook, not to try and schedule the audits.

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DOCUMENT TITLE: DOE/ID-10886 (Appendix G)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
95.	Section 3.1, 5th bullet	3-1	See Comment #2 regarding the proper regulatory citation and requirements for wastes excavated from the CAMU.	Please see response to Comment #2.

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DOCUMENT TITLE: DOE/ID-10998 (Appendix H)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
96.	Section 2.5	8 (also refers to IDEQ comment #200)	Please see Comment #11 regarding re-sampling.	See response to Comment #11.
97.	Section 3, 1st para.	11	See Comment #45 regarding Subpart F requirements while investigating other potential sources under CFR 264.98(g)(6).	See response to Comment #45.
98.	Section 4, 1st para.	12	The intent of DOE to evaluate the perched water by the end of April 2003 should be placed in the schedule in Appendix N.	Accept. May 2003 was added to the schedule.

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DOCUMENT TITLE: DOE/ID-10903 (Appendix I)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
99.	Section 1.2, 2nd bullet	1-2	Please clarify what is meant by the statement that the scope does not attempt to predict success of the CFS formulas. It is unclear why the USDOE is not confident that the CFS method will work.	The statement says we are not attempting to predict success. If the CFS formula does not succeed, then the waste will be decreased and the test repeated. The text will be clarified to state that we are not predicting success.
100.	Section 1.4, 2nd para., last sentence	1-3	Please confirm that when the TCLP test is performed on the treated waste, that all TCLP metals will be analyzed for and compared to the treatment standard. In other words, if a waste is profiled for mercury, the testing review will be for all metals and not just mercury.	A statement will be added that says "All TCLP tests on treated waste metals will be analyzed for all TCLP metals."
101.	Section 3.3.7, 1st para.	3-8	Please clarify whether the testing plan is to test one mix design and await TCLP results and then conduct another mix design, or to test several WL mixtures at at the same time.	The test plan is set up to test one mix at a time. However, dependent on the waste and the time considerations, several mixtures may be tested at once.
102.	Sub-appendix A, Section A-5, 2nd bullet	A-4	This decision rule should be expanded to provide confirmation testing of the successful batch test. The wording of the bullet implies that if several failures occur during testing along with one successful test, that the successful test will become the chosen recipe. The successful formulation should be retested on additional batches to confirm the recipe will produce successful treatment.	Confirmation testing via TCLP will be performed during treatment of the soil to determine the success of the recipe. Some criteria will be added to the text to clarify that more tests will be run if • The TLCP results are close to the appropriate limit • Several tests have failed.

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DOCUMENT TITLE: DOE/ID-10924 (Appendix J)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
103.	Section 3.4	3-2	Please clarify where the generator will be sending the samples for the Treatability study. Specifically, explain whether the ICDF Complex will manage a sample storage area or whether the samples will be sent to a lab by the generator.	The generator will send the treatability study sample to the ICDF. Prior to receiving the sample, the ICDF operations manager will make arrangements for the treatability study to be completed at a laboratory. The ICDF will send the sample to the laboratory. The first sentence of Section 3.4 will be reworded as follows: Upon receipt of the generator's Material Profile sheet and the determination that a treatability study is needed, the waste generator will supply to the ICDF an acceptable sample within 10 days. The samples will be stored in the treatment room.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – IDEQ

DOCUMENT TITLE: EDF-2236 (Appendix K)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
104.	Section 3, 1st complete para.	5	Please clarify whether the computer program mentioned for emissions calculations will be operational by the time the landfill is scheduled to open.	The computer program mentioned in Section 3 pertains to radionuclide emissions. This program will be available for review during the prefinal inspection.

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DOCUMENT TITLE: EDF-2237 (Appendix L)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
105.	General		The meteorological data used for modeling has numerous hours where the rural mixing heights are below 30 meters. This is fairly unrealistic and can result in an overestimation of ambient concentrations when modeling groundlevel or near groundlevel sources. Hourly mixing heights are calculated by algorithms present in the meteorological data preprocessor that interpolate between a groundlevel mixing height at the instant of sunrise and periodic upper air measurement data. IDEQ will allow all mixing height values below 30 meters to be changed to a value of 30 meters. This change is not required by IDEQ, but it may provide greater operational flexibility.	This information is appreciated. Comment noted. No text change.
106.	Section 3.2, 2nd sentence, Item 2	3-2	DEQ suggests the following clarification, "the ISCST3 model provides the pollutant concentration at the facility boundary and along public roadways that bisect the facility."	Comment will be incorporated.
107.	Section 4.2.2	4-7	a) Upon review of the ISC input files on the submitted CDs, the receptor density for the annual runs appears to be very conservative. If additional modeling runs are needed, the receptor density could be reduced somewhat without sacrificing the quality of the result. A receptor spacing of 200 meters rather than 100 meters would be acceptable and would significantly reduce the run time of the model.	a) This information is appreciated. It is believed that the currently modeled operational limits provide adequate flexibility for the operation of the ICDF Complex. No text change.

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DOCUMENT TITLE: EDF-2237 (Appendix L)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
			b) Upon review of the ISC input files on the submitted CDs, DEQ requests that a 24-hour modeling run be conducted using an expanded receptor grid that surrounds the source (even if some of the receptors are inside of the facility boundary) in addition to the receptors along the public roadways. The receptors should be located far enough from the source so the results demonstrate that maximum concentrations are always observed along the public roadways with receptors along the facility boundary being omitted. A single modeling run using unit emissions rates will be adequate for this purpose.	b) All scenarios that were requested have been modeled. Further modeling at this point provides no additional information. Concentrations for low-level area sources with no vertical momentum or thermal buoyancy, such as the ICDF sources, produce modeled maximum concentrations at the receptors that are closest to the source. The nearest publicly accessible location to the ICDF sources are directly south along US Route 20(26). All other areas accessible to the public, such as the facility boundary, are farther from the ICDF sources, and would therefore have lower modeled concentrations.

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DOCUMENT TITLE: DOE/ID-11005 (Appendix M)				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
108.	Section 1.1, last para.	3	The PLDRS and the LDRS should be sampled at least annually to establish a base line. These two areas should not see much water but if liquids are present they should be sampled for baseline parameters.	A statement will be added to Appendix M that says "If water is present, the PLDRS will be collected annually (in the spring) and analyzed for pH and specific conductivity."
109.	Table 3	18	In accordance with the information presented in Table 3, it appears that temperature is another field parameter that should be recorded.	Temperature will be added.
110.	Section 6.1, 1st para.	22	Please add Temperature testing in the first sentence of the section.	Temperature will be added.

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ICDF DRAFT FINAL REMEDIAL ACTION WORK PLAN - RESOLUTIONS TO DRAFT FINAL DOCUMENT REVIEW, COMMENT, RESOLUTION LIST – IDEQ

DOCUMENT TITLE: DOE/ID-11000 (Appendix A) – Editorial Comments				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
111.	Section 1.2.6, 4th sentence	1-11	Please insert the word "to" after 'the object of stabilization is'.	Comment will be incorporated.
112.	Section 4.4.1, last para.	4-14	Should there be a 'than' inserted after the word 'rather'?	Comment will be incorporated.
113.	Section 4.9.5.3, last para., 2nd sentence	4-23	Please modify the wording from *"ASTM 698 will develop will develop"* to just *"will be developed."*	Comment will be incorporated.
114.	Sub-appendix A, Overviews 4.6.5, Section 5, 1st para.	1 of 2	There appears to be a typographical error on the last line. Should it be 300,000 gallons?	Comment will be incorporated.
115.	Sub-appendix A, Overviews 4.12.8, Section 5, 2nd bullet	2 of 2	Please delete "I" after the word "appropriate" in the first sentence.	Comment will be incorporated.
116.	Sub-appendix A, Overviews 5.1, 2nd bullet	6 of 7	There appears to be a typographical error: the word "loader" should be "loaded."	Comment will be incorporated.

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DOCUMENT TITLE: Appendix F – Editorial Comments				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
117.	Section 4.4.1, 1st sentence	4-3	The word "of " after the word "exposure" should be removed.	Comment will be incorporated.

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DOCUMENT TITLE: Appendix H – Editorial Comments				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
118.	Section 2.1, 2nd para.	3	The text states, *"It is anticipated that waste emplacement will occur in July 2002."* Please change the referenced date to 2003.	Comment will be incorporated.

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DOCUMENT TITLE: Appendix O – Editorial Comments				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
119.	Sub-Appendix G, Section G 2.2.1.2	G28	There appear to be sections missing (e.g., Sections 2.2.1.3 and 2.2.1.4).	The section numbers presented in Appendix G of the On-Site Versus Off-Site Cost Comparison (EDF-2385 - Appendix O of the RA WP) are correct. In developing the cost estimates, a common work breakdown structure (WBS) was developed to allow for a common understanding of the various activities (design, construction, operations, etc.) across all of the alternatives evaluated. For some activities in the different alternatives (on-Site treat and disposal, off-Site treat & disposal, and on-Site treat with off-Site disposal), there is no comparable activity in the other alternatives. Using this common WBS allows for comparing the individual activities across all alternatives and identification of the other unique activities to the alternative. Specifically, Sections G-2.2.1.3 and G-2.2.1.4 would have corresponded to "Post Treatment Sampling and Analysis" and "Post Treatment Shipping Container Analysis (Debris)" for the off-Site treatment and disposal. Because under the off-Site treatment and disposal alternative, the waste would be sent untreated to the disposal facility for treatment and disposal (treatment is part of the activities associated with G-2.2.2.9a, "Packaging for Off-Site Disposal Operations," and included in the disposal unit rate), these activities are not included. However, under the off-Site disposal alternative (on-Site treatment with off-Site disposal),

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DOCUMENT TITLE: Appendix O – Editorial Comments				
Item	Section/ Figure/ Appendix	Page	Comment	Resolution
				both the Post Treatment Sampling and Analysis and Post Treatment Shipping Container Analysis (Debris) are included in Sections G-3.2.1.3 and G-3.2.1.4.