Appendix A

SAP Tables

Appendix A
SAP Tables

Sampling and Analysis Plan Table for Chemical and Radiological Analysis

Plan Table Number: GROUP2-SOILS

DRAFT

SAP Number: DOE/ID-11065

Date: 05/18/2003 Plan Table Revision: 6.0 Project: GROUP 2 EARLY REMEDIAL ACTION CHARACT OF V-TANKS SOILS Project Manager: JESSMORE, J. J. SMO Contact: KIRCHNER, D. R.

Sample Description						Sample Location				Enter Analysis Types (AT) and Quantity Requested																			
										AT1	AT2	AT3	AT4	AT5	AT6	AT7	AT8	AT9	AT10	AT11	AT12	AT13	AT14	AT15	AT16	AT17	AT18	AT19	AT20
Sampling Activity	Sample Type	Sample Matrix	Coll Type	Sampling Method	Planned Date	Area	Type of Location	Location	Depth (ft)	3A	9A	C1	C2	F1	R4	HM	PH	R6	RH	EM	S3	TH	TI	TB	TA	TV	RB	VL	VM
1RA750	REG	SOIL	COMP	CORE	2003	TANK	V-TANK AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA751	REG	SOIL	COMP	CORE	2003	TANK	V-TANK AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA752	REG	SOIL	COMP	CORE	2003	TANK	V-TANK AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA753	REG	SOIL	COMP	CORE	2003	TANK	V-TANK AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA754	REG	SOIL	COMP	CORE	2003	TANK	V-TANK AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA755	REG	SOIL	COMP	CORE	2003	TANK	V-TANK AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA756	REG	SOIL	COMP	CORE	2003	TANK	TSF-21 AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA757	REG	SOIL	COMP	CORE	2003	TANK	TSF-21 AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA758	REG	SOIL	COMP	CORE	2003	TANK	TSF-21 AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA759	REG	SOIL	COMP	CORE	2003	TANK	TSF-21 AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA760	REG	SOIL	COMP	CORE	2003	TANK	TSF-21 AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA761	REG	SOIL	COMP	CORE	2003	TANK	TSF-21 AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA762	REG/QC	SOIL	DUP	CORE	2003	TANK	V-TK SPILL AREA	TSF-09/18	NA	2		2			2			2	2								2	2	
1RA763	REG	SOIL	COMP	CORE	2003	TANK	V-TK SPILL AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA764	REG	SOIL	COMP	CORE	2003	TANK	V-TK SPILL AREA	TSF-09/18	NA	1		1			1			1	1								1	1	

The sampling activity displayed on this table represents the first six characters of the sample identification number.

AT1: Analysis Suite #1
AT2: Analysis Suite #2
AT3: CLP Metals
AT4: Cyanide
AT5: Fluoride
AT6: Gamma Spec
AT7: Herbicides (8150) - MS/MSD
AT8: Hydrogen ion (pH)
AT9: Iodine-129
AT10: Radiochemistry - Suite 1

The complete sample identification number (10 characters) will appear on field guidance forms and sample labels.

AT11: SVOCs (CLP TAL) - MS/MSD
AT12: Sulfide
AT13: TCLP Herbicides
AT14: TCLP Metals
AT15: TCLP Pesticides
AT16: TCLP SVOCs
AT17: TCLP VOCs
AT18: Tritium
AT19: VOCs (CLP TAL)
AT20: VOCs (CLP TAL) - MS/MSD

Comments:

Uranium Isotopes = U-233/234, U-235, U-238
Gamma Spec = Am-241, Sb-125, Ce-144, Cs-134, Cs-137, Co-58, Co-60, Eu-152, Eu-154, Eu-155, Mn-54, Nb-95, Ra-226, Ru-103, Ru-106, Ag-108m, Ag-110, U-235, Zn-65, Zr-95
Herbicides (8150) - MS/MSD = Herbicides (8151A) TCLP TAL - MS/MSD and Pesticides (8081A) TCLP TAL MS/MSD - MS/MSD
SVOCs (CLP TAL) - MS/MSD also includes PCBs - MS/MSD
Samples beginning with 1RA are Remedial Action
Samples beginning with 1WM are Waste Management
Phase II sampling will be based on a dynamic workplan approach (see Figure 4-1 of DOE/ID-11065)

Analysis Suites:

Analysis Suite #1: SVOCs (CLP TAL), PCBs
Analysis Suite #2: Pesticides (TCLP TAL), Herbicides (TCLP List)
Radiochemistry - Suite 1: Cm-242, Am-241, Cm-243/244, Ni-63, Np-237, Pu-238, Pu-239/240, U-isu, Sr-90

Contingencies:

Plan Table Number: GROUP2-SOILS

DRAFT

SAP Number: DOE/ID-11065

Date: 05/19/2003 Plan Table Revision: 6.0 Project: GROUP 2 EARLY REMEDIAL ACTION CHARACT OF V-TANKS SOILS Project Manager: JESSMORE, J. J. SMO Contact: KIRCHNER, D. R.

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Sampling Activity	Sample Type	Sample Matrix	Coll Type	Sampling Method	Planned Date	Area	Type of Location	Location	Depth (ft)	3A	9A	C1	C2	FI	R4	HM	PH	RI	RH	EM	S3	TH	TI	TB	TA	TV	R9	VL	VM
1RA765	REG	SOIL	COMP	CORE	2003	TAN	V-TK SPILL AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA766	REG	SOIL	COMP	CORE	2003	TAN	V-TK SPILL AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA767	REG	SOIL	COMP	CORE	2003	TAN	V-TK SPILL AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA768	REG	SOIL	COMP	CORE	2003	TAN	V-TK SPILL AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA769	REG	SOIL	COMP	CORE	2003	TAN	V-TK SPILL AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA770	REG	SOIL	COMP	CORE	2003	TAN	V-TK SPILL AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA771	REG	SOIL	COMP	CORE	2003	TAN	V-TK SPILL AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA772	REG	SOIL	COMP	CORE	2003	TAN	WINDBLOWN	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA773	REG	SOIL	COMP	CORE	2003	TAN	WINDBLOWN	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA774	REG/QC	SOIL	DUP	CORE	2003	TAN	WINDBLOWN	TSF-09/18	NA	2		2			2			2	2								2	2	
1RA775	REG	SOIL	COMP	CORE	2003	TAN	PIPING AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA776	REG	SOIL	COMP	CORE	2003	TAN	PIPING AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA777	REG	SOIL	COMP	CORE	2003	TAN	PIPING AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA778	REG	SOIL	COMP	CORE	2003	TAN	PIPING AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1RA779	REG	SOIL	COMP	CORE	2003	TAN	PIPING AREA	TSF-09/18	NA	1		1			1			1	1								1	1	

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AT17: TCLP VOCs
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Comments:
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Contingencies

Plan Table Number: GROUP2-SOILS

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Sampling Activity	Sample Type	Sample Matrix	Coll Type	Sampling Method		Area	Type of Location	Location	Depth (ft)	3A	9A	C1	C2	FI	R4	HM	PH	RI	RH	EM	S3	TH	TI	TB	TA	TV	R9	VL	VM
1RA780	REG	SOIL	COMP	CORE	2003	TAN	PIPING AREA	TSF-09/18	NA	1		1			1			1	1								1	1	
1WM750	REG	SOIL	COMP	CORE	2003	TAN	V-TANK AREA	TSF-09/18	NA	1		1	1	1	1		1	1	1		1	1	1	1	1	1	1	1	
1WM751	REG	SOIL	COMP	CORE	2003	TAN	V-TANK AREA	TSF-09/18	NA	1		1	1	1	1		1	1	1		1	1	1	1	1	1	1	1	
1WM752	REG	SOIL	COMP	CORE	2003	TAN	V-TANK AREA	TSF-09/18	NA	1		1	1	1	1		1	1	1		1	1	1	1	1	1	1	1	
1WM753	REG	SOIL	COMP	CORE	2003	TAN	V-TANK AREA	TSF-09/18	NA	1		1	1	1	1		1	1	1		1	1	1	1	1	1	1	1	
1WM754	REG	SOIL	COMP	CORE	2003	TAN	V-TANK AREA	TSF-09/18	NA	1		1	1	1	1		1	1	1		1	1	1	1	1	1	1	1	
1WM755	REG	SOIL	COMP	CORE	2003	TAN	V-TANK AREA	TSF-09/18	NA	1		1	1	1	1		1	1	1		1	1	1	1	1	1	1	1	
1WM756	REG	SOIL	COMP	CORE	2003	TAN	TSF-21 AREA	TSF-09/18	NA	1		1	1	1	1		1	1	1		1	1	1	1	1	1	1	1	
1WM757	REG	SOIL	COMP	CORE	2003	TAN	TSF-21 AREA	TSF-09/18	NA	1		1	1	1	1		1	1	1		1	1	1	1	1	1	1	1	
1WM758	REG	SOIL	COMP	CORE	2003	TAN	TSF-21 AREA	TSF-09/18	NA	1		1	1	1	1		1	1	1		1	1	1	1	1	1	1	1	
1WM759	REG/QC	SOIL	DUP	CORE	2003	TAN	TSF-21 AREA	TSF-09/18	NA	2		2	2	2	2		2	2	2		2	2	2	2	2	2	2	2	
1WM760	REG	SOIL	COMP	CORE	2003	TAN	TSF-21 AREA	TSF-09/18	NA	1		1	1	1	1		1	1	1		1	1	1	1	1	1	1	1	
1WM761	REG	SOIL	COMP	CORE	2003	TAN	TSF-21 AREA	TSF-09/18	NA	1		1	1	1	1		1	1	1		1	1	1	1	1	1	1	1	
1WM762	REG	WATER	COMP	CORE	2003	TAN	DECON WATER	TSF-09/18	NA	1	1	1	1	1	1	1	1	1	1		1						1	1	
1WM763	REG	WATER	COMP	CORE	2003	TAN	DECON WATER	TSF-09/18	NA	1	1	1	1	1	1		1	1	1		1						1		1

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1WM764	REG	WATER	COMP	CORE	2003	TAN	DECON WATER	TSF-09/10	NA		1	1	1	1	1		1	1	1	1	1						1	1	
FBK100	QC	WATER	FBLK		2003	TAN	FIELD BLANK	QC	NA						1			1	1								1		
TBK100	QC	WATER	TBLK		2003	TAN	TRIP BLANK	QC	NA																			1	

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AT16: TCLP SVOCs
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AT19: VOCs (CLP TAL)
AT20: VOCs (CLP TAL) - MS/MSD

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Uranium Isotopes = U-233/234, U-235, U-238

Gamma Spec = Am-241, Sb-125, Ce-144, Cs-134, Cs-137, Co-58, Co-60, Eu-152, Eu-154, Eu-155, Mn-54, Nb-95, Ra-226, Ru-103, Ru-106, Ag-108m, Ag-110, U-235, Zn-65, Zr-95

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Radiochemistry - Suite 1: Cm-242, Am-241, Cm-243/244, Ni-63, Np-237, Pu-238, Pu-239/240, U-total, Sr-90

Contingencies:

Appendix B

Potential Organic and Inorganic Contaminants Tables for the V-Tanks

Appendix B

Potential Organic and Inorganic Contaminants Tables for the V-Tanks

Table B-1. Potential Contaminants for Tanks V-1, V-2, V-3 and V-9.

Tank/Waste Phase	Potential Contaminants
V-1 (Liquid)	Antimony Choromethane Hexachlorobenzene Hexachlorobutadiene Lead Mercury Tetrachloroethene Trichloroethene
V-1 (Solid)	Antimony Beryllium Bis(2-ethylhexyl)phthalate Cadmium Hexachlorobenzene Hexachlorobutadiene Nickel Nitrobenzene Tetrachloroethene Trichloroethene 2,4,6-Trichlorophenol Note: PCBs > 50 ppm present.
V-2 (Liquid)	trans-1,2-Dichloroethene 2,4-Dinitrotoluene Hexachlorobenzene Hexachlorobutadiene Trichloroethene
V-2 (Solid)	Antimony Bis(2-ethylhexyl)phthalate Cadmium Chloroethane Chromium
V-2 (Solid)	1,2-Dichlorobenzene 2,4-Dinitrotoluene Hexachloroethane Nickel Pentachlorophenol Pyridine Tetrachloroethene Trichloroethene Vinyl Chloride Note: PCBs > 50 ppm present.

Tank/Waste Phase	Potential Contaminants
V-3 (Liquid)	Chloromethane 2,4-Dinitrotoluene Hexachlorobenzene Hexachlorobutadiene Trichloroethene
V-3 (Solid)	Beryllium Cadmium Bis(2-ethylhexyl)phalate Chloroethane Chromium 1,2-Dichlorobenzene 2,4-Dinitrotoluene Hexachloroethane Nickel Pyridine Tetrachloroethene Trichloroethene Vinyl Chloride Note: PCBs > 50 ppm present.
V-9 (Liquid)	Benzene Cadmium Chloroform 3,3-Dichlorobenzidene (Dibenz (a,h) anthracene) 1,1-Dichloroethane 1,2-Dichloroethane 2,4-Dimethylphenol Indeno (1,2,3-cd) pyrene Lead Mercury Methylene Chloride 2-Methylphenol (o-cresol) 4-Methylphenol (p-cresol) Nickel Phenol Tetrachloroethene 1,1,1-Trichloroethane Trichloroethene
V-9 (Solid)	Barium Beryllium Benzene Bis(2-ethylhexyl)phthalate Bromomethane Cadmium Chloroform Chloromethane Chromium

Tank/Waste Phase	Potential Contaminants
	1,2-Dichlorobenzene
	1,3-Dichlorobenzene
	1,4-Dichlorobenzene
	1,2-Dichloroethane
	1,1-Dichloroethene
	2,4-Dimethylphenol
	Lead
	Mercury
	2-Methylphenol
	4-Methylphenol
	Naphthalene
	Nickel
	Phenanthrene
	Phenol
	Pyridine
	Silver
	Tetrachloroethene
	Thallium
	1,2,4-Trichlorobenzene
	1,1,1-Trichloroethane
	Trichloroethene
	Vinyl Chloride
	Note: PCBs > 50 ppm present

Table B-2. Potential Contaminants for Sand Filter.

Tank/ Waste Phase	Potential Contaminants
Sand Filter (solid)	Cadmium
	Acenaphthene
	Acenaphthylene
	Athracene
	Benzo(a)anthracene
	Benzo(a)pyrene
	Benzo(b)fluoranthene
	Benzo(g,h,l)perylene
	Benzo(k)fluoranthene
	Butylbenzylphthalate
	Bis (2-chloroethoxy) methane
	Bis (2-chloroethyl) ether
	Bis (2-chloroisopropyl) ether
	Bis(2-ethylhexyl)phthalate
	4-Bromophenyl-phenylether
	Chrysene
	4-Chloroaniline
	4-Chloro-3-methylphenol
	2-Chloronaphthalene
	2-Chlorophenol
	Dibenz(a,h)anthracene
	1,2-Dichlorobenzene
	1,3-Dichlorobenzene
	1,4-Dichlorobenzene
	3,3-Dichlorobenzidiene
	2,4-Dichlorophenol
	Diethylphthalate
	2,4-Dichlorophenol
	Dimethylphthalate
	Di-n-butylphthalate
	Di-n-octylplhthalate
	2,4-Dinitrophenol
	2,4-Dinitrotoluene
	2,6-Dinitrotoluene
	Fluoranthene
	Fluorene
	Hexachlorobenzene
	Hexachlorobutadiene
	Hexachlorocyclopentadiene
	Hexachloroethane
	Indeno(1,2,3-cd)pyrene
	2-Methylphenol
	4-Methylphenol
	Napthalene
	2-Nitroaniline
	4-Nitroaniline
	Nitrobenzene

Tank/ Waste Phase	Potential Contaminants
	2-Nitrophenol
	4-Nitrophenol
	N-nitroso-dimethylamine
	N-nitroso-di-n-propylamine
	N-nitrosodiphenylamine
	Pentachlorophenol
	Phenanthrene
	Phenol
	Pyrene
	Pyridine
	Trichloroethene
	2,3,5-Trichlorophenol
	2,4,6-Trichlorophenol
	Note: PCBs > 50 ppm present.

Appendix C

Project Document Review Records

Appendix C

Project Document Review Records

INEEL

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Field Sample Plan for Early Remedial Activities at Waste Area Group 1, Operable Unit 1-10 Remedial Action

DATE: 5/13/03 REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
SPECIFIC COMMENTS				
1	3.2.3, Paragraph 1 and 2.	3-5	The relation between the use of Cs-137 to define the area of contamination and using Cs-137 to identify other COPCs is not clear. While concentrations of Cs-137 greater than 23.3 pCi/gr do indicate areas that will have to be removed in order to achieve unrestricted use in the future, it is not clear if that same concentration indicates the area of contamination in respect to operations of the treatment system for the V-tanks. Also, in the second paragraph, does the presence of Cs-137 alone trigger the need for analysis of other COPCs or does the level of Cs-137 have to exceed the 23.3 pCi/gr level?	Comment incorporated. The following statement was added to the 3rd paragraph: "This conclusion is based on previous sampling in the V-Tank area. In the event sample results indicate areas of hazardous waste contamination without also being radiologically contaminated, additional sampling may be required and additional contaminants of concern identified."

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2	3.2.5, Bullets 2 and 4.	3-7	Again it is not clear given these bullets what the relationship is between Cs-137 and other COPCs. How is the following situation resolved based on the text in this section; Cs-137 is <23.3 pCi/gr and thus the area will not be remediated based on bullet 2 but analyses of other COPCs indicate unacceptable risks?	Comment incorporated. See response to comment 1. A review of the data from previous soil sampling campaigns at various locations and depths around the V-Tanks has shown that radionuclide contamination is always associated with hazardous constituent contamination. Furthermore, additional risk assessment work is underway that will identify hazardous constituent concentrations that could pose unacceptable risk. It is anticipated that this work, coupled with a review of the sample results from this FSP and previous sampling efforts, will prove that Cs-137 will always be detected whenever a hazardous constituent is at or near its threshold risk value. In the event this assumption is proven wrong, additional sampling will be conducted as indicated in this plan.
3	Section 4.2 QA/QC Samples	4-6	In regards to QC samples for soil, is 1 QC sample/ 10 soils samples necessary or is 1 QC sample/media/day adequate?	Comment incorporated. 1 QC sample/media/day is adequate and the text has been modified. Text also modified in Section 6.3.1, 4th paragraph, and Section 7.1, 2nd paragraph.

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4	5.1.2	5-1	It is not clear in the text if the core is stored in the core barrel or if it is extracted from the core barrel prior to wrapping and storing. If the latter, then the decon procedures for the core barrel should be stated in this document.	Comment incorporated. 3rd sentence of 1st paragraph now reads, "All cores will be sealed and stored in the core barrels in a refrigerated environment until the down-hole gamma logging for that particular boring has been completed."
5	5.1.5	5-3	The rate at which rinsate QA samples will be collected must be provided.	Comment incorporated. The following sentence was added to the section, "Rinsate QA samples will be collected 1 per 10 core sampling assemblies."

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
1			The dynamic work plan approach to sampling is supported by IDEQ. Many advantages exist over a static work plan as discussed in this document. It is important that the figures in the document that identify proposed borehole locations, and the SAP tables contain the necessary information that allows them the flexibility of the dynamic sampling approach.	Comment incorporated. A note has been inserted into Figure 4-1 stating, "Phase II sampling will be based on a dynamic workplan approach. If it is determined that the soil borings already completed in a given area have provided sufficient data then other planned borings in that area may be eliminated or moved to a location where the boring might be expected to provide better information." A similar note has been inserted into the SAP Tables.
2			The issue of transfer of site "closure authority" from RCRA to CERCLA is not an acceptable approach, as closure is a RCRA program activity whereas the FFA/CO addresses remedial actions. It is recommended that all references regarding this subject be removed from the document.	Comment incorporated. References regarding "closure authority" have been removed from the document.
3			The Proposed Final Remediation Goals in Appendix B are incorrect. The units for organics and inorganics are also incorrect.	Comment incorporated. Appendix B has been deleted from the document because it is no longer relevant. It had been a reference from an earlier revision of the document that was mistakenly not edited out during this submittal.

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4			It is recommended that the results from surface geophysical techniques be included in the Field Sampling Plan. Surface geophysical techniques include, but are not limited to, ground penetrating radar (GPR), magnetometry, and electromagnetic techniques. Use of any of these techniques should be dictated by the project data quality objectives (Section 3), and the objectives of these techniques should be to locate the boundaries of suspected or known underground metallic objects or volumes of disturbed soil. The areas surveyed should be described and shown on site maps. Surface geophysical surveys should be conducted within predetermined grids defined by transect lines crossing each site or area of interest. The spacing of the grids is determined from the approximate features to be located. Location and elevation information sufficient to map and assess the survey results should be recorded. Location data, instrument numbers, calibration information, geophysical interpretation, and maps for all geophysical surveys should be stored in project files	Comment noted. A geophysical survey has been conducted and will be taken into account when field locating soil borings.
5			Describe how the site will be restored following sampling activities (borehole abandonment, excavations, grading, etc.)	Comment incorporated. A note has been inserted into Figure 4-1 stating, "Boreholes will be abandoned by backfilling with cuttings and/or bentonite."
SPECIFIC COMMENTS				
1	Section 1, Second Paragraph, Second Sentence	1-1	It is recommended to change "evident" to "present." Soil contamination may be present at the site, but may not be evident.	Comment incorporated. "Evident" has been changed to "present."
2	Section 1.2.13, Heading	1-10	Please add "LTS" to the list of acronyms.	Comment incorporated. "LTS" has been added to the list of acronyms.

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3	Section 2.1.2, Second Paragraph, Last Sentence	2-4	Table C-1 in Appendix C does not include radionuclides in the listing of potential contaminants. Please add these radionuclides or explain why they are omitted from this table.	Comment noted. The tables in Appendix C are based on the Chemical Characterization report (WESTON-2001), which documents historical potential contaminants for the V-tanks and sand filter from a hazardous waste perspective and not from a radiological perspective. Radionuclide data is provided throughout the text. Note: Appendix C has been relabeled as Appendix B due to the deletion of the old Appendix B.
4	Section 2.1.2, Third Paragraph, Fourth Sentence	2-7	Please identify if the area impacted by runoff from the adjacent cask storage pad will be characterized as part of this sampling effort. Addressing the runoff outside the AOC from the cask storage unit, and the cask storage pad itself, remain an issue.	Comment incorporated. Zone B is designated as an area where leaks and spills have occurred. The southern Zone B partially overlaps the cask area (pad, crane girders, and bracing) and Boring SS-01 has been relocated closer to the cask area in order to address. Core sampling directly on the cask area is not possible due to the overhead interference of the crane girders and bracing. Figure 4-1 has been modified accordingly.

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5	Section 2.1.2, Fourth Paragraph, Last Sentence	2-7	It is recommended that the ditch and culvert be investigated for possible contamination. The ditch should be incrementally examined from the where the spill originated in order to identify if the culvert may have been contaminated.	Comment noted. Boring SS-02 is located beyond the area where the spill may have flowed. If contamination exists at SS-02, then the ditch and culvert will be investigated further.
6a	Section 2.1.5, Sixth Paragraph	2-11	The Valve Pit discussion begins with a description of the pit, but then refers to the pit in subsequent sentences as a "tank." The Valve Pit was a concrete vault and should not be referred to as a tank unless there was another vesicle in the pit that is being described here as a tank. The references to "tank" should be changed to "pit" or "vault."	Comment incorporated. The references to "tank" have been changed to "pit."
6b	Section 2.1.5, Sixth Paragraph	2-11	It is assumed that the seventh sentence "The Valve Pit swells with melted liquids from the ice…" is trying to convey that the volume of liquids in the Valve Pit increases with the melting of the seasonal ice, rather than the Valve Pit actually "swelling." If swelling is meant to describe the results of pressure from ice freezing in the winter (and possibly creating the "numerous cracks and holes" described earlier in the paragraph), then that should be stated.	Comment incorporated. The text has been clarified as suggested.
6c	Section 2.1.5, Sixth Paragraph	2-11	The meaning of the last sentence is unclear. Please explain "migration."	Comment incorporated. The last sentence has been clarified to read: "Therefore, circumstantial evidence suggested that water entered and exited seasonally as noted by the liquid level changes and watermarks inside TSF-21."
7	Section 2.1.5.4, Last Sentence	2-13	Typographical error; the "S" in PCBS should be lower case. Please reword sentence to state: "The highest concentration of PCBs detected in sludge was 32.7 mg/kg..."	Comment incorporated. The sentence has been corrected as suggested.

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8	Section 2.3.2, Last Paragraph, First Sentence	2-20	Please provide the disposition path information for the containerized soils in Table 2-2 (i.e. how they were disposed of).	Comment incorporated. The following sentence was added to the second paragraph of page 2-20: "The containers listed in Table 2-2 are currently stored at the INTEC Building CPP-1617 and are slated to be disposed of at the ICDF Complex."
9	Section 2.4	2-21	The area potentially affected by runoff from the Cask Storage Pad, as well as the pad itself, should be added as a data gap.	Comment incorporated. Data gap number 6 has been added as follows: "6. Cask Storage Area – There is a lack of sampling and analytical data to determine whether or not there is contamination due to runoff from the cask storage pad."
10	Section 3, First Paragraph, First Sentence	3-1	Please add ILRW to the list of acronyms.	Comment incorporated. ILRW has been added to the list of acronyms.
11	Section 3.1, First Bullet	3-1	Please reword bullet to state: "Define and attempt to minimize the three-dimensional footprint of the V-Tank sites." Minimization of the footprint should be a goal, but if additional contamination is encountered, then it may not be possible.	Comment incorporated. The bullet has been reworded as suggested.
12	Section 3.1, Second Paragraph, Second Sentence	3-1	In regards to the reference to transfer of site closure authority from RCRA to CERCLA, please see General Comment 2.	Comment incorporated. Reference to closure authority has been removed as suggested.

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13	Section 3.1, Second Paragraph, Last Sentence	3-1	Please provide information regarding the relationship between the RAOs that will be generated from the data gathered and the Proposed FRGs in Appendix B. In order to ensure that total risk posed by the contaminants is less than 1E-04, cumulative effects of all contaminants should be considered.	Comment incorporated. Appendix B has been deleted from the document because it is no longer relevant. It had been a reference from an earlier revision of the document that was mistakenly not edited out during this submittal. There is no relationship between the RAOs and these FRGs.
14	Section 3.2.2, Second Set of Bullets, Sixth Bullet	3-4	Alternative treatment/disposal options to be investigated should result in a Decision Statement. A disposition path needs to be identified for contaminated soils that do not meet waste acceptance criteria for the intended disposal facility.	Comment incorporated. DS3 and DS4 have been changed to read as follows: "DS3: Determine whether sufficient information is available to provide waste profile information to the intended disposal facility or the alternate treatment/disposal facility." and "DS4: Determine whether contaminated soils in the area to be remediated at the V-Tank sites meet the waste acceptance criteria for the intended disposal facility or the alternate treatment/disposal facility."

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15	Section 3.2.3, First Paragraph, Last Sentence	3-4	Please state the set of circumstance(s) that will lead to an action level being based on a regulatory threshold or standard versus being derived from a problem-specific consideration such as risk analysis (i.e. how will V-tank action levels be determined?)	Comment incorporated. The following sentence was added to the end of this first paragraph: "If the AA is for waste profiling purposes, then the action levels will be based on regulatory thresholds or standards. If the AA is for CERCLA remediation purposes, then the action levels will be based on a risk analysis."
16	Section 3.2.3, Second Paragraph, Second to the Last Sentence	3-5	In this section, the FRG for Cs-137 is stated as 23.3 pCi/g, which is correct. In Appendix B, the FRG for Cs-137 is stated as 89,400 pCi/g. See General Comment 3.	Comment incorporated. Appendix B has been deleted from the document because it is no longer relevant. It had been a reference from an earlier revision of the document that was mistakenly not edited out during this submittal.
17	Section 3.2.3, Third Paragraph	3-5	Although other potential contaminants may exist in areas where Cs-137 exists, it may not be true that if Cs-137 is not detected, there are no other potential contaminants of concern. This is unless proof exists that every known potential contaminant of concern at the site was associated with Cs-137. Decision Statement number 2 is to determine if Cs-137 is representative of the contaminants within the area of contamination, but does not state that if there is no Cs-137 there is no other contamination.	Comment incorporated. The following statement will be added to this paragraph: "This conclusion is based on previous sampling in the V-Tank area. In the event sample results indicate areas of hazardous waste contamination without also being radiologically contaminated, additional sampling may be required and additional contaminants of concern identified."

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18	Table 3-1, Data Use Number 2	3-6	The reference to a transfer of site closure authority from RCRA to CERCLA should be deleted. Please refer to General Comment 2.	Comment incorporated. Reference to closure authority has been removed.
19	Section 3.2.5, Second Paragraph	3-7	Please indicate if "all of the contaminated soils surrounding the V-Tanks" includes the soils lying beneath the V-Tanks, and the former location of the TSF-21 Valve Pit.	Comment incorporated. The first sentence of the paragraph has been changed as follows: "For the V-Tank sites, the population of interest has been defined as all of the contaminated soils surrounding the V-Tanks and TSF-21 (to include soils beneath these structures), and the shallow ditch as shown in Figure 4-1."

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20	Section 3.2.5, Fourth Bullet	3-7	If the spatial boundaries will only be sampled for Cs-137 (second paragraph Section 3.2.4), it is not clear how it will be determined if Cs-137 is not representative of the contaminants within the area of contamination. Only by detecting other contaminants and no Cs-137 can the first part of this statement be true. Please discuss.	Comment incorporated. See response to comment 17. A review of the data from previous soil sampling campaigns at various locations and depths around the V-Tanks has shown that radionuclide contamination is always associated with hazardous constituent contamination. Furthermore, additional risk assessment work is underway that will identify hazardous constituent concentrations that could pose unacceptable risk. It is anticipated that this work, coupled with a review of the sample results from this FSP and previous sampling efforts, will prove that Cs-137 will always be detected whenever a hazardous constituent is at or near its threshold risk value. In the event this assumption is proven wrong, additional sampling will be conducted as indicated in this plan.

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21	Section 4.1.2, Second Paragraph	4-3	It is recommended that borehole locations on Figure 4-1 be notated to reflect the dynamic work plan approach discussed in this paragraph.	Comment incorporated. A note has been inserted into Figure 4-1 stating, "Phase II sampling will be based on a dynamic workplan approach. If it is determined that the soil borings already completed in a given area have provided sufficient data then other planned borings in that area may be eliminated or moved to a location where the boring might be expected to provide better information."
22	Sections 4.1 through 4.1.2.3	4-1 through 4-4, and Figure 4-1, Page 4-2	All the sections reference Figure 4-1 to illustrate various zones and sampling locations, etc. Figure 4-1 is too busy to adequately illustrate these features, and the sampling locations, both shallow and deep (especially DS-02), are barely discernible on the figure. A suggestion would be to create a new figure based on a larger scale that would better illustrate the zones and sampling locations discussed in the sections cited.	Comment incorporated. Boring label DS-02 has been moved for clarity. Figure 4-1 will be submitted as an 11x17 foldout in order to provide better clarity
23	Section 4.1.2.1, First Bullet	4-3	Please identify whether remediation goals will be identified by the Final Remediation Goals in Appendix B, or by some other method. It is unclear throughout the document how remediation goals will be set (see specific comments 13 and 15).	Comment incorporated. The remediation goals will not be defined by the FRGs in Appendix B. Appendix B has been deleted from the document because it is no longer relevant. It had been a reference from an earlier revision of the document that was mistakenly not edited out during this submittal.

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24	Section 4.1.2.1, Third Bullet, Section 4.1.2.2, Third Bullet	4-4	Please provide an explanation as to how the deep sampling locations (DS-01 and DS-02) were determined.	Comment noted. DS-01 is the approximate location of the known spill into the ditch and therefore will be used to determine the depth of contamination from the spill, if any. DS-02 is the location to determine whether there is further contamination beneath the removed valve pit, TSF-21.
25	Section 4.1.2.3, Second Bullet	4-4	If Zone C sampling is to evaluate whether wind blown contamination has migrated north of the area, please rationalize why sampling will be performed down to a depth of 10 feet.	Comment noted. Sampling will be performed to a depth of 10' in order to account for clean fill that may have been brought into the area (possibly up to 4') and to be able to use the down-hole gamma logger (at least 3' below the clean fill).
26	Section 4.1.3, First Paragraph, Third Sentence	4-5	Please add "CLP" to the list of acronyms.	Comment incorporated. "CLP" has been added to the list of acronyms.
27	Section 4.1.3, Third Paragraph	4-5	Notation should be added to the SAP tables in Appendix A in order to accommodate the flexibility of a dynamic field sampling effort.	Comment incorporated. A notation similar to the one added to Figure 4-1 (see comment 1) has been added to the SAP Tables.

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28	Section 6, First Paragraph, First Sentence	6-1	Please add "ILRW" to the list of acronyms.	Comment incorporated. "ILRW" has been added to the list of acronyms.
29	Section 6.1, First Paragraph, Third Sentence	6-1	Typographical error, "characterized" should be "characterize."	Comment incorporated. Typographical error has been corrected as suggested.
30	Section 10, First Paragraph	10-1	Radiological screening is included here as one of the items discussed in Section 10.2, but a discussion of the topic could not be found in that section.	Comment incorporated. The following sentence was added to the end of the first paragraph in Section 10.2: "All samples will be radiologically screened prior to shipment as directed by Rad-Con."
31	Section 11, References	11-1	Typographical errors, DOE-ID 1998b – "D. Nugard" should be "D. Nygard". DOE-ID, 2002a – "202" should be "2002."	Comment incorporated. Typographical errors have been corrected as suggested.
32	Appendix B		Please verify Final Remediation Goals for radionuclides in Table B-1. Volatiles and inorganic units should obviously not be in pCi/g and should also be double-checked for the accuracy of the FRGs. There are several FRGs listed in the table, too numerous to mention here, that appear inaccurate.	Comment incorporated. Appendix B has been deleted from the document because it is no longer relevant. It had been a reference from an earlier revision of the document that was mistakenly not edited out during this submittal.

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33	Appendix C		The appendix is not comprehensive for the V-Tanks contaminants, and should be labeled as "Potential Organic and Inorganic Contaminant Tables," since no radionuclides are listed in the tables.	Comment incorporated. The label has been changed as suggested. Note: Appendix C has also been relabeled as Appendix B due to the deletion of the old Appendix B.