



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10 HANFORD/INL PROJECT OFFICE

309 Bradley Boulevard, Suite 115  
Richland, Washington 99352

July 30, 2008

Joe R. Franco, Assistant Manager  
For the River Corridor  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

Re: EPA Comments on the Sampling and Analysis Plan for the 618-10 and 618-11  
Nonintrusive Sampling, DOE/RL-2008-27, Draft A

Dear Mr. Franco:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document and is providing comments in this letter. Please feel free to contact me at (509)376-4919 regarding these comments or any other concerns about the cleanup of the 300 Area.

Sincerely,

A handwritten signature in cursive script that reads "Alicia Boyd".

Alicia Boyd  
300 Area Project Manager

Enclosure

cc: Lynn Albin, DOH  
Gail Laws, DOE  
Deborah Singleton, Ecology  
Administrative Record: 618-10 and 618-11 Burial Grounds

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**EPA comments on Sampling and Analysis Plan for 618-10 and 618-11 Nonintrusive Sampling (DOE/RL-2008-27 Draft A).  
Submitted via e-mail/mail to DOE (Chris Smith) July 30, 2008**

1. Section 1.0, Paragraph 1: Add a line describing that the burial grounds are covered by the 300-FF-2 Record of Decision (2001) and Explanation of Significant Difference (2004). This information is more important than stating that the burial grounds are located in the 600 Area.
2. Section 1.3.1, Paragraph 4: Add some background information on why stabilization soil was added to the 618-10 burial ground in 1983.
3. Section 1.3.1, Paragraph 4: Include text describing the unplanned release in 1983 and how the spread of contamination was contained.
4. Figure 1-2: Please include what information was used to create this map (ie. GPR, original plans, aerial photos). Also, please do the same for Figure 1-4.
5. Section 1.4, Paragraph 1, 1<sup>st</sup> sentence: Remove the phrase "non-intrusive sampling." The COC list should be the complete COC/COPC list for the burial ground. We do not compile one COC list for non-intrusive sampling and another one for intrusive sampling or remediation. If there are several COPCs that cannot be measured for during the non-intrusive sampling process, draft a subset list for what will be analyzed in this process, clearly stating what COCs will not be analyzed.
6. Section 1.4.2, 2<sup>nd</sup> bullet: There should be minimums on the amount of direct push/MDP points around each VPU and caisson. Suggested minimum is at least 2 at each VPU and at least 3 at each caisson. If there is a technical justification for other numbers, please discuss with EPA. Change the language in section 3.1 to reflect this as well.
7. Section 1.5, Paragraph 2: The DQO process that has already occurred was not specific to non-intrusive sampling, and does not need to be completely redone. Please change wording to describe that the DQO process will be refined or revisited specific to intrusive characterization.
8. Section 1.5, Paragraph 2, last sentence: This statement makes no sense. The schedules reflect intrusive characterization. Schedule modifications will be necessary if intrusive characterization is *not* needed.
9. Section 1.5.1, #5: Change language to state either the minimums and maximums from comment #6 or add the phrase "*an average of four per VPU, six per caisson.*"
10. Figure 1-6 (and other locations): Remediation is not included in the schedule provided. There is a milestone to complete the 618-10/618-11 remediation by September 30, 2018. DOE and EPA have discussed that intrusive characterization may not be required before remediation can begin on the trenches, but this was not discussed in the document. The SAP must address the concept of overlapping characterization with remediation. This will address the idea that remediation will most likely begin before the projected completion of intrusive characterization (shown in Figure 1-6 as mid FY 2016 and FY 2017). This information should also be summarized in section 1.0.

11. Section 1.5.2 & 1.5.3: Assumption number 7 in both of these sections is redundant, please remove.
12. Section 2.4, last sentences: Add wording to the effect of the following “DOE and EPA will review the results of the MDP system operability test prior to deploying the MDP in the field.”
13. Section 2.4, Paragraph 3, 2<sup>nd</sup> sentence: Please change the phrase “as determined by the 618-10 and 618-11 project manager” to “as determined by the 618-10 and 618-11 project manager *and approved by EPA.*”
14. Section 3.1, Paragraph 1, 1<sup>st</sup> sentence: Please replace “... further characterization and/or, eventually, remediation activities...” with “... further characterization and remediation activities...” There are far too many locations in the document where confusing statements like this exist. Further characterization may occur, but remediation *will be completed within 10 years* from now. “Eventually” does not convey the appropriate idea.
15. Section 3.1, Paragraph 1, last sentence: “non-intrusive characterization activities” are mentioned and described throughout this document. Many persons would consider neither direct push probes nor the sample collection as “non-intrusive.” Add language here and in the beginning of the document to describe the sampling (already exists), to say why DOE considers it “non-intrusive” and to define in clear terms what we mean by “non-intrusive” for the rest of the document. It is EPA’s opinion that this work *is* intrusive, but that physical waste will not be exposed to the open air environment. If that is the intended delineation between intrusive and non-intrusive, clearly state this.
16. Section 3.1, Paragraph 3, 1<sup>st</sup> sentence: Change wording from “up to 10% of the VPUs” to “approximately 10% of the VPUs”
17. Section 3.1, Paragraph 3, 1<sup>st</sup> sentence: How will the VPUs be selected for sampling based on the geophysics and MDP data? As EPA and DOE have previously discussed, the rationale for grouping VPU will be based on a certain amount of engineering judgment during the analysis of data from the MDP. However, a process or decision logic must be included in this SAP, as the guiding document for the work.
18. Section 3.1, Paragraph 3, last sentence: It is unclear why there is any difference in the data needed to determine the contamination controls necessary for sampling below the VPU and within the footprint of the trenches. What are these data differences? Please explain why samples are being taken at the VPU and not within (or beneath) the trenches.
19. Section 3.3.1, Paragraph 2: Update language to include minimum number of probe points. Add language similar to the following: “If less than 3 probe points will be installed at a particular VPU, concurrence from the DOE and EPA project managers will be obtained.”
20. Section 3.5.1 (and 3.5.3): Please describe whether the direct-push soil samples will be collected from the existing pushes that the MDP used or from new locations. Will the samples be taken from beside the VPU or will the pushes be angled to try for soil samples directly beneath the VPU?