



100-HR-1

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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

July 2, 1992

Mr. Eric Goller
U. S. Department of Energy
P. O. Box 550 MSIN: A5-19
Richland, WA 99352

Dear Mr. Goller:

Re: Nonintrusive Source Investigation Field Activities
(DOW) of 1607-H4 Septic Tile Field of 100-HR-1

Ecology, along with the U.S. Environmental Protection Agency (EPA) as a support agency, has completed the review of the nonintrusive source investigation field activities of 1607-H4 septic tile field of 100-HR-1. The review comments indicate further clarification of certain areas is required, and also some additional technical information is recommended. The comments and recommendations are attached.

In order to facilitate expedited resolution of these comments, it would be in the best interest of all parties to have a meeting at the earliest convenience.

If you have any questions, please do not hesitate to call me at (509) 546-4301.

Sincerely,

Dib Goswami
Unit Manager
Nuclear and Mixed Waste Management Program



cc: Darci Teel

Comments and Recommendations on Nonintrusive source Investigation Field Activities of 1607-H4 Septic Tile Field of 100-HR-1

OK

1. ~~Comment/Recommendation~~: Section 1.0

The Scope of work should mention the contaminants of concern for which the proposed limited field investigation is planned. *Add Section 1.0*

2. ~~Comment/Recommendation~~: Section 3.0

OK

Sampling and field activities include both screening of organic vapor and radiation in the area. The details of the instrumentation methods and procedures to be followed during calibration and field procedures are missing in the text. It should be mentioned in the same way as it was mentioned in 100-RC-5

3. ~~Comment/Recommendation~~: Section 3.4

OK

According to the text, if the GPR data is found inclusive, the excavated depth of the test pit would be approximately 4 feet. The reason for going down to 4 feet deep must be given with reference to the depth at which the tile field is expected. *Add Section 3.4*

4. ~~Comment/Recommendation~~: Section 3.5

OK

It is assumed that a geologist or the Team Leader will be responsible for collecting or overseeing the collection of test pit samples. This should be mentioned in the text.

5. ~~Comment/Recommendation~~: Section 3.5

OK

Criteria to collect the second sample 6 ft. after the first sample must be identified.

6. ~~Comment/Recommendation~~: Section 5.0

OK

The list of metals given in table 1 of the DOW is significantly shorter than the list of metals given in the primary list of contaminants of interest (Table 3-31) of the work plan. An explanation for this is necessary.

7. Comment/ Recommendation: Section 7.0

The sampling date needs to be corrected. The date shown on the schedule has already been passed.

8. Comment/ Recommendation: Section 8.0

According to the text, a regulatory agency should contact the operable unit coordinator for any change of schedule. It should be stated here that it is the responsibility of the operable unit coordinator/DOE to inform the regulatory agencies about any major change that is to be made in advance for approval. The text should incorporate the above.

*Needs to be corrected
E. D. Rowe*

1. **Accepted** The contaminates of concern are listed in Section 3.3.1.
2. Section 3.0 mentions the background action points and the EII for use of the instrument. This section contains the same information that is in Section of 3.1 of WHC-SD-EN-AP-070, Rev. 2 (100-BC-5 DOW), the format is different but the same information is there.
3. It is understood that nonintrusive sampling is excavation down to four feet, intrusive is greater than four feet. The work plan recommends that one trench be established and no other guidance. WHC intent is to dig a cross trench to locate the drain line, than excavate a trench along the line and take a sample. Since this nonintrusive sampling the intent is to only to go to four feet. If the drain lines are not present (for whatever reason) the sampling activity will be terminated and options reassessed.
4. **Accepted** Several section through the text imply that the field team leader is responsible. EII 5.2 (the procedure used to collect sample) Section 4.1 states that the FTL is responsible.
5. The work plan has no criteria. This criteria has been developed by the cognizant engineer and has been used at other sites. ~~If the regulators have any suggestion, WHC is open to discuss them.~~
6. Table 1 is instruction to the field personnel for sample collection. This information includes containers type and size; markings on the container of analytes, methods, and holding times; and preservatives added to the sample. The term "AA metals, mercury, and cyanide" means the same as TAL-CLP.
7. **Accepted.** First week in August.
8. The regulatory agency is notified five days in advance through a Agreement Activity Notification Form. This forms gives the projected start date. and is good for twenty working days. Section 8 reminds the regulators that they should check with the OU coordinator for actual dates of any sampling activities.

Ecology comments and resolutions on the DOW for the 100-HR-1 sampling of the 1607-H4 septic tank.

1. Comment - Section 1.0

The scope of work should mention the contaminants of concern for which the proposed limited field investigation is planned.

Accept: Will add a sentence further explaining the contaminants of concern

2. Comment - Section 3.0

Sampling and field activities include both screening for organic vapor and radiation in the area. The details of the instrumentation methods and procedures to be followed during calibration and field procedures are missing in the text. It should be mentioned in the same way as it was mentioned in 100-BC-5.

Accept: Will add the two paragraphs out of the 100-BC-5 report regarding the Organic Vapor analyzer and the Radiation Detection Instrument. Will also expand on how background is taken.

3. Comment - Section 3.4

According to the text, if the GPR data is found inclusive, the excavated depth of the test pit would be approximately 4 feet. The reason for going down to 4 feet deep must be given with reference to the depth at which the tile field is expected.

Accept in part: Will expand that the FTL may authorize a change in depth to approximately 10 feet or, the digging limit of the small backhoe.

4. Comment - Section 3.5

It is assumed that a geologist or the Team Leader will be responsible for collecting or overseeing the collection of test pit samples. This should be mentioned in the text.

Accept: Will add that the FTL is responsible for the collection of samples.

5. Comment - Section 3.5

Criteria to collect the second sample 6 feet after the first sample must be identified.

Accept: Will expand the criteria for sample collection.

6. Comment - Section 5.0

The list of metals given in Table 1 of the DOW is significantly shorter than the list of metals given in the primary list of contaminants of interest (Table 3-31) of the work plan. An explanation for this is necessary.

Ecology did not realize that Table 1, as written in the DOW, says the same as in the workplan - it is in a different format. Ecology accepted this as written.

7. Comment - Section 7.0

The sample date needs to be corrected. The date shown on the schedule has already been passed.

Date changed to August 3, 1992.

8. Comment - Section 8.0

According to the text, a regulatory agency should contact the operable unit coordinator for any change of schedule. It should be stated here that it is the responsibility of the operable unit coordinator/DOE to inform the regulatory agencies about any major change that is to be made in advance for approval. The text should incorporate the above.

Accept: Will better explain the notifications needed. Regulators ~~will~~^{should} give a courtesy call to DOE prior to visiting the job site.