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July 8, 1991

Steven H. Wisness
Tri-Party Agreement Manager
U.S. Department of Energy
P.O. Box 550, A5-19
Richland, Washington 99352

Re: 316-5 Process Trenches Expedited Response Action Sampling
and Analysis Plan

Dear Mr. Wisness:

The U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) and their contractors have completed the review of the Sampling and Analysis Plan (SAP) for the 316-5 Process Trenches Expedited Response Action.

Our review of the enclosed document has revealed some minor deficiencies which must be addressed in the SAP prior to the initiation of field sampling activities. The EPA approves the SAP under the contingency that the attached comments are incorporated into this plan.

If you have any questions, please contact me at 376-4919.

Sincerely,

Pamela S. Innis
Unit Manager

Enclosure

cc: Richard Hibbard, Ecology
Dave Nylander, Ecology
Bob Stewart, DOE
Administrative Record (316-5 Process Trenches)



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COMMENTS

For the most part, the sampling plan adequately addresses the proposed sampling and data quality objectives. However, there are a few discrepancies in the sampling plan that should be clarified or explained, as follows:

1. Comment: Section 1.0, page 1, first paragraph

The last sentence states that future discharges to the trenches are monitored and are within regulatory guidelines. A reference for this statement should be provided.

2. Comment: Section 3.0, page 1, second paragraph

The type of field instruments that will be used for screening of volatile organic compounds and radiological constituents should be identified.

3. Comment: Section 3.0, page 2, fourth paragraph

The text should identify the screening levels for samples prior to shipment to an off-site laboratory.

4. Comment: Section 3.0, page 3, Table 1

The unit "pCi/m" for alpha spectroscopic analysis should be written as pCi/g.

The units for gross alpha and beta analysis should be specified.

The most current versions of the U.S. Environmental Protection Agency (EPA) Contract Laboratory Program (CLP) Statements of Work (1990a,b) should be cited.

EPA 1989b is incorrectly referenced in footnote (g). The correct reference is EPA 1984.

5. Comment: Section 5.1.1, page 4, third paragraph

The location for interim storage, of the excavated sample soil should be included.

6. Comment: Section 5.2, page 6

Sampling plan modifications that do not qualify as minor field changes shall be approved by the lead agency, the U.S. Environmental Protection Agency, through the use of a change notice as per the Tri-Party Agreement. Minor field changes, as defined in Section 12.4 of the Hanford Federal Facility Agreement and Consent Order, may be made by the field team leader.

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7. Comment: Section 6.1, page 7

A figure showing the proposed sampling locations should be included.

8. Comment: Section 7.1, page 8

The reference EPA 1986 should be included in Section 8.0, References.

9. Comment: Section 7.2, page 9

The analytical data generated by CLP laboratories should be independently validated using EPA (1988a,b) guidelines.

REFERENCES

EPA, 1988a. Laboratory Data Validation Functional Guidelines for Evaluating Organics Analyses. U.S. Environmental Protection Agency, Hazardous Site Evaluation Division, Washington, D.C. February 1, 1988.

EPA, 1988b. Laboratory Data Validation Functional Guidelines for Evaluating Inorganics Analyses. U.S. Environmental Protection Agency, Hazardous Site Evaluation Division, Washington, D.C. July 1, 1988.

EPA, 1990a. Contract Laboratory Program Statement of Work for Organics Analysis. Multi-Media, Multi-Concentration. U.S. Environmental Protection Agency. Document Number OLM01.0. March 1990.

EPA, 1990b. Contract Laboratory Program Statement of Work for Inorganics Analysis. Multi-Media, Multi-Concentration. U.S. Environmental Protection Agency. Document Number IL01.0. March 1990.

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Subject: 316-5 Process Trenches Expedited Response Action Sampling and Analysis Plan

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