

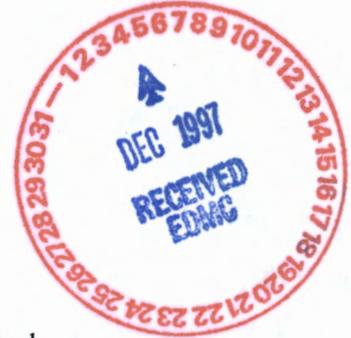
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD PROJECT OFFICE
712 SWIFT BOULEVARD, SUITE 5
RICHLAND, WASHINGTON 99352

November 25, 1997

Mr. John Sands
U.S. Department of Energy
P.O. Box 550, MSN H0-12
Richland, WA 99352



Re: Sampling and Analysis Plan for the REDOX Plutonium Loadout Hood

Dear Mr. Sands:

The U.S. Environmental Protection Agency has completed the review of the *Sampling and Analysis Plan for the REDOX Plutonium Loadout Hood*, DOE/RL-97-75 dated September 1997. The review focused on the technical adequacy of the sampling plan and adherence to EPA guidelines. 48172

A detail that is touched on in the sampling plan concerns the D&D of the loadout hood. The detailed work plan for 1998-2000 does not indicate any action in the REDOX building specific to the D&D of the loadout hood, yet the sampling plan notes that the D&D may occur simultaneously with the D&D of 233-S. Additionally, there is no CERCLA documentation that covers D&D of the Loadout Hood, therefore that waste generated during the D&D is not available for disposal in ERDF. Further discussion is necessary with regard to these issues.

An electronic version of the comments has been forwarded for your convenience. If you have any questions, please call me at 376-4919.

Sincerely,

A handwritten signature in cursive script that reads "Pamela S. Innis".

Pamela S. Innis
REDOX Project Manager

cc: Administrative Record (REDOX)
Alisa Huckaby, Ecology

Introduction

The U.S. Environmental Protection Agency has completed the review of the *Sampling and Analysis Plan for the REDOX Plutonium Loadout Hood*, DOE/RL-97-75, dated September 1997. The plan was reviewed for technical adequacy of the proposed sampling.

Section 1.1.2, page 5, second paragraph, third sentence. Additional information should be provided on the type of sample taken (e.g., liquid from the leak, residues below the leak, etc.) This will have bearing on COPC locations specified in Table 2.

Section 1.1.2, page 5 and 6. A reference for the sampling information should be provided. If no reference is available, complete sample data should be made available.

Section 1.1.3, page 7 and 8. A reference to PCBs is made in Table 2 but not discussed on the preceding page. Please clarify this inconsistency. Additionally, lead is noted in the sampling event on page 5 and 6 but specified only as part of construction materials or light bulbs(?) on page 7. Please rectify this.

Section 1.2.1.1, page 13. It should be noted that EPA is the lead regulatory agency on CERCLA actions at REDOX, including the sampling at the Plutonium Loadout Hood.

Section 1.2.1.2, page 13. This section should reflect the current schedule. Phase I sampling is noted to occur in November 14-20. This is prior to the draft review. Additionally, it is not clear under what authority the D&D of the loadout hood will occur. The detailed work plan for 1998-2000 does not indicate any action in the REDOX building specific to the loadout hood. Additionally, here is no CERCLA document that covers D&D of the Loadout Hood. It is assumed that an EE/CA may be developed for this action.

Section 1.2.2.3, page 14, Decision Statement #2. Designation should be based on characteristic designation determined from sampling and process designation. The text should reflect this.

Table 6, page 15, #2-2. The text specifies that the "detection of nondangerous waste will increase cost significantly . . .". It is not clear why nondangerous waste discovery would increase cost. Please clarify.

Section 1.2.5.2, page 16. It is unclear why ERDF WAC are the primary action levels specified in this section. It is also unclear which alternative actions are being evaluated. Please clarify this.

Table 8, page 18. Hexone is noted as having an unlimited action level. The ERDF WAC for Hexone (MIBK) is currently stated at 33 mg/kg as defined in the LDR for that constituent.

Section 1.2.5.3, page 19, Action Rule #2. The first sentence should state that "media will be designated as a dangerous waste, treated as required, and will be disposed . . .".

Section 2.2.5, page 25. This section references Table 11 regarding QC samples yet specifies no field QC samples. This leads to confusion. It is recommended that field equipment blanks be taken prior to sampling.

Section 2.4.2, page 28. The first sentence implies that validation is optional. Some level of data validation should be completed, though Level C data validation is not necessary.

Section 3.2, page 29, third paragraph. The last two sentences discuss designation of waste, assumed to be equipment. It must be agreed to by the agencies that the sampling done is considered representative for that material prior to designation.

Section 3.2, pages 29 through 33. Some inconsistencies exist between the COPCs presented and those found in Table 2. For example, lead is specified as a COPC of paint in Table 2, yet waste stream #1 lists lead (as it should) for interior pipe sampling.

Section 3.2.3, page 31. This section notes that waste stream #1 sampling should be considered adequate to provide an upper bound on the hood interior and on process vessels. This seems unclear as waste stream sample #1 covers the residual material on the interior of the pipe. Samples for surface contamination should be taken separately to adequately characterize the exterior surfaces.

Section 3.2.6, page 32. The decontamination waste swipe should be biased high to set upper concentrations. Some level of field screening should be used to determine a higher concentration swipe for inclusion as a sample.

Section 3.2.8, page 33. The intent of this section is not clear. This document is to be used for characterization of the REDOX loadout hood. This paragraph implies that D&D activities are concurrent with the sampling. DOE should recognize that no CERCLA authorization has been given to conduct this action and any waste resulting from the D&D of the process hood would result in waste that is not available for disposal in ERDF.

Section 3.5, page 34. Insufficient detail is provided on the handling, storage, and disposal of waste generated as a result of the sampling efforts at the loadout hood. Detail should include provided concerning aspects in the form of a waste control plan. Additionally, the last sentence is somewhat confusing. Sample material being returned from the lab should be handled in accordance with the lab/BHI contract and disposed of as specified in this section. No additional approval is necessary once the SAP has been approved.