R-016-208.1

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RESPONSE TO U.S. EPA COMMENTS ON WASTE PIT SIX REMOVAL ACTION

12-11-90

[redacted]

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RESPONSE TO U.S. EPA COMMENTS ON WASTE PIT SIX REMOVAL ACTION

COMMENTS:

1. The sampling and analysis section of the work plan does not provide a clear statement of its intended purpose or objectives. It is not possible to access whether the sampling and analysis is adequate without a clear understanding of its objectives. Sampling and analysis plans should address the following items:

   - o Site Activities
   - o Sampling Objectives
   - o Determination of Sample Types
   - o Determination of Chemicals of Concern
   - o Determination of Sample Location and Frequency
   - o Sampling Equipment and Procedure
   - o Sample Handling
   - o Decontamination Procedures
   - o Sample Custody and Documentation

RESPONSE:

The revised Sampling and Analysis plan, enclosed with this transmittal includes a discussion of the intended purpose of this sampling, which can be summarized as; first to determine, at least tentatively, the emissions from waste pit six, secondly, to monitor potential worker exposure during the removal action, and finally, to obtain long term emission rates from the pit area. Additionally, the specific information requested from your comment has been included in this Sampling and Analysis Plan.

COMMENTS:

2. The sampling and analysis plan needs to consider the requirements of the national ambient air quality standards as Applicable or Relevant and Appropriate Requirements (ARARs), as well as other ARARs.

RESPONSE:

A narrative discussing the potential air emissions generated by the conduct of this removal action and actions to be taken to minimize this generation have been included.

COMMENTS:

3. In addition to integrating the analytical data into the environmental air monitoring program, this data (as well as other air monitoring data from other portions of the site) should also be integrated into the Remedial Investigation/Feasibility Study (RI/FS).

RESPONSE:

Data collected during this removal action will be provided to the RI/FS Contractor for consideration for inclusion into the Remedial Investigation Report. Data collected from the air monitoring stations are summarized into the Environmental Monitoring Report and are being evaluated by the RI/FS Contractor.

COMMENTS:

4. All sampling should be conducted prior to, during, and after the removal action activities. Sampling prior to the removal activities will establish a baseline condition; sampling during removal activities will provide health and safety information; and sampling after removal activities will provide information on effectiveness of the removal activity.

RESPONSE:

The commitment to conduct sampling before, during and after this removal action has been clarified in the revised plan.

COMMENTS:

5. The use of a meteorological station to continuously measure and record wind speed, wind direction, temperature, and humidity is always appropriate when conducting atmospheric air sampling.

RESPONSE:

This data will be obtained and will be summarized in the final report. This commitment has been included in the revised plan.

COMMENTS:

6. The table presented in the SAP does not provide sufficient information for two of the analytical methods. First, a specific analytical method should be listed for determining the uranium concentration in air samples. Secondly, the concentration of 1,1,2,2-Tetrachloroethane in air samples can't be directly measured with a HNu photo-ionization unit.

RESPONSE:

The specific analytical method for the analysis of the uranium in the collected air samples has been included in the table. The concentration of 1,1,2,2,-Tetrachloroethane can not be measured directly with a HNu photo-ionization detector. However, this instrument with the 11.7 ev lamp can identify this chemical and can be used to estimate airborne levels. The background level for the HNu will be established upwind of the pit, all readings detected by the HNu downwind of the pit will be assumed to be due to 1,1,2,2-Tetrachloroethane. This analysis is conservative and included for worker protection. If readings on the HNu are detected above 10 ppm, upgraded respiratory protection will be required. It is anticipated that no organic vapors will be detected during the conduct of this removal action. Portable IR (Miran 1B) or GC equipment may be used to augment evaluations conducted by broad spectrum instruments to better evaluate for this chemical.

COMMENTS:

7. A sampling location on the East side of Pit 6 should also be included for high volume air sampling and inorganic particulate sampling.

RESPONSE:

Air samples will be collected on the East side of the pit. The plan will be modified to include this change.

COMMENTS:

8. All CERCLA actions conducted at the site are required to be conducted in accordance with the RI/FS Quality Assurance Project Plan (QAPP). Since the existing QAPP does not contain sufficient information to address this type of sampling, a QAPP addendum should be prepared.

RESPONSE:

The QAPP does not include sufficient data to discuss the collection and analysis of airborne radioactive particulates. A section has been developed and included in this workplan to support this collection and analysis.

COMMENTS:

9. The laboratory conducting the analysis should be specified. Only laboratories specified in the approved QAPP may be used.

RESPONSE:

The IT Laboratory in Oak Ridge (Radiological Sciences) will be used to conduct analysis of the air samples collected for radioactive particulates. This laboratory is identified in the approved version of the QAPP.

COMMENTS:

10. The frequency, number and type of quality control samples should be specified.

RESPONSE:

The frequency, number, and type of quality control samples will be specified in the plan and will be based on laboratory procedures and the analysis of similar samples collected on site.