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**FEMP RESPONSES TO UNITED STATES EPA
COMMENTS ON THE FEMP BACKGROUND
SAMPLING PLAN, REVISION 0, SUBMITTED
OCTOBER 1991**

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ENCLOSURE

**FEMP RESPONSES TO
U.S. EPA COMMENTS**

FEMP RESPONSES TO UNITED STATES EPA COMMENTS ON THE FEMP BACKGROUND SAMPLING PLAN, REVISION 0, SUBMITTED OCTOBER 1991.

U.S. EPA GENERAL COMMENT 1:

The Background Sampling Plan focuses primarily on surface soil and to a limited extent on subsurface soil. However, ground water, surface water, sediments, and air should also be sampled to establish background levels of contaminants in all media at the Fernald Environmental Management Project (FEMP) site.

FEMP RESPONSE:

This RI/FS Work Plan Addendum is focused on the Background Characteristics of Soils at the FEMP site. The approach to establish background characteristics of other environmental media is addressed in the Risk Assessment RI/FS Work Plan Addendum previously submitted to U.S. EPA and Ohio EPA.

U.S. EPA GENERAL COMMENT 2:

The quality of the maps included in the Background Sampling Plan should be improved. Each map should include a legend, and important features such as roads, streams, and the boundary of the production area should be clearly identified.

FEMP RESPONSE:

Improved maps are included in the draft final background sampling plan provided with this submittal.

U.S. EPA SPECIFIC COMMENT 1:

Page 6, Third Paragraph, Last Sentence: This sentence states that the prevailing winds are generally from the west, which reduces the possibility of airborne contamination of the proposed sampling areas by FEMP operations. However, the wind rose diagram for a height of 10 meters shown in Attachment 8 indicates that the prevailing winds are from the northeast and east-northeast 20 percent of the time, and from the south-southwest and southwest 22 percent of the time with the remainder being all other directions. The winds from the south-southwest could have transported contaminants from FEMP's production facility to proposed sampling location number 4. The winds from the northeast and east-northeast could have transported contaminants from FEMP's production facility to proposed sampling locations numbers 1 and 5. Therefore, these locations should be re-evaluated as proposed background sampling locations.

FEMP RESPONSE:

The draft final addendum includes a windrose reflecting available data from 1987 through 1990. This windrose clearly indicates that the least frequent wind direction is from the southeast to the northwest. Consistent with this and other considerations, the location of the proposed background soil samples to be collected under this addendum have been repositioned to the northwest of the site.

U.S. EPA SPECIFIC COMMENT 2:

Page 8, Third Paragraph: List of equipment and supplies required for collection of soil samples: This list should include sample coolers required to maintain collected samples at 4°C.

FEMP RESPONSE:

The list of equipment and supplies have been deleted from the Work Plan Addendum as they are duplicative of the contents of the RI/FS Quality Assurance Project Plan (QAPP). Sampling and analysis activities completed pursuant to this plan will be conducted in accordance with the provisions of the QAPP.

U.S. EPA SPECIFIC COMMENT 3:

Page 9, Second Paragraph, First Sentence: Subsurface soil should be sampled at more frequent and regular intervals than those proposed in this sentence. The plan proposes to collect one sample from each lithologic zone between 3 and 20 feet below the land surface. This implies that only one sample may be taken over a 17 foot interval. Geochemical variation may be present within the same lithologic unit and should be included in determining background concentrations. Therefore, it is recommended that samples at regular 5 foot intervals be collected if any lithologic unit is more than 5 feet thick.

FEMP RESPONSE:

DOE has adopted a revised approach to determining the background characteristics of soils at the FEMP site. This revised approach was discussed with representatives of Ohio EPA and U.S. EPA at a January 16, 1992, meeting in Chicago, Illinois, and is reflected in the draft final plan provided with this submittal.

U.S. EPA SPECIFIC COMMENT 4:

Page 9, Second Paragraph, First Sentence: Subsurface soil samples should also be collected from below the water table. It is also important to accurately define background conditions of the saturated zone upgradient of the facility. Background concentrations of total organic carbon and cation exchange capacity are important in contaminant transport modelling and should be considered to be added to the sampling plan.

FEMP RESPONSE:

As discussed in the draft final sampling plan, sampling will be limited to the unsaturated glacial till material. Other site specific sampling data (including past RI/FS sampling performed at background well locations) and/or literature values will be used to describe the background characteristics of other environmental media at FEMP. See the recently submitted Risk Assessment RI/FS Work Plan Addendum for more details.

U.S. EPA RADIATION ISSUES:

Section 2.2, para. 2 (page 6), sentence 3--It is stated that the proposed background sample locations are northwest and west of the Fernald Environmental Management Project (FEMP) production site. Attachment 6, a map indicating the proposed background sample locations, shows the locations being southwest and west of the FEMP production site, a contradiction to the text statement. It is highly questionable that these areas are "not likely" to have been contaminated from surface runoff or airborne contaminant from the FEMP. Clarification is needed to explain this inconsistency.

FEMP RESPONSE:

See response to U.S. EPA Specific Comment 1 above.

Section 2.2, para. 2 (page 6), last sentence--The Windrose diagrams of the FEMP in 1989 of Attachment 8 are cited. In selecting locations for background sampling to minimize the possibility of airborne contamination by the FEMP (FMPC) operations, it appears that those locations should lie northwesterly of the FEMP production site as stated in the text. Most of the locations indicated in Attachment 6 are southwest of the FEMP production site and seem much more likely to have been subjected to airborne contamination. Further locations should be sought that have been truly undisturbed by airborne contamination rather than "minimizing the possibility of past contamination" alone. Locations that have remained covered since 1951, such as the underside of old barn slabs and older buildings, should be utilized for background measurements.

FEMP RESPONSE:

The sample areas have been relocated to the Northwest as previously discussed to accommodate the geomorphology of the area and the prevailing winds. Based upon available data from a study performed in 1985 for NLO/DOE by IT Corporation in support of litigation, there is no indication of influence of FEMP operations on soils characteristics at a distance of 3 miles from the center of the FEMP production area to the northwest. Consistent with these findings and an understanding of the geologic history of the area, the background soil sampling locations have been relocated to the northwest quadrant at a distance of between 3 and 6 miles from the center of the site.

Section 2.2, para. 3 (page 6), sentence 1--It is stated that "the predominant use of the areas proposed for background sampling is agricultural." If these areas were farmed using phosphate fertilizers, a material containing elevated levels of naturally-occurring radioactivity, then the samples may not accurately depict background for radionuclides. The plan must address this possibility and assure sampling in areas undisturbed and uncontaminated from local plant operations or local practices.

FEMP RESPONSE:

As previously discussed, the proposed sampling approach has been revised. The samples will be collected from 3 to 6 miles from the center of the FEMP to the northwest. Existing data collected during past site studies indicate there to be no measurable impact from FEMP operations in this direction and at this distance. Further, as discussed in the draft final sampling plan, samples will be collected from 3 discrete depths at 30 random locations. These depths were specifically selected to provide an understanding of weathering effects and the effects of mans activities on background characteristics.

Section 3.2, para. 3 (page 9), sentence 4--It is stated that "radionuclide analyses will only be conducted for the 0 to 6 inch soil sample". Radionuclide analyses must be conducted for all samples to provide a basis for background comparison to previous and future samples taken at the FEMP.

FEMP RESPONSE:

The sampling approach has been revised to provide for analysis for radionuclides on all samples collected.

Section 3.2, para. 1 (page 9)--Three sample locations providing 12 sampling points are not adequate for proper statistical analysis to determine background concentrations. Moreover, averaging across varying strata should not be permitted; it obscures stratigraphic variation and introduces bias in a computation of average background and standard deviation since different soil strata may have differing natural background levels. More sample locations are necessary with the mean and standard deviation of each constituent concentration calculated for comparable depths or lithologic zones/strata. In the Uranium Mill Tailings Remedial Action Project in Grand Junction, Colorado, conducted by DOE, the inclusion protocol for contaminated vicinity properties contains the following statement:

"Background levels will be calculated from measurements made at a minimum of 30 representative locations within the region surrounding a designated processing site, taking into account any sub-regions where unusually high or low background levels may exist. Such measurements will not be made in the vicinity of known radioactive contamination. From these data, a mean background level and a standard deviation of the mean are calculated for use in establishing action levels for both indoor and outdoor on-site surveys within the region."
 ("Summary Protocol, UMRAP Vicinity Properties, Identification-Characterization-Inclusion," U.S. DOE, September 1983)

FEMP RESPONSE:

The sampling approach has been revised to examine 30 locations, with discrete samples collected at 3 depth intervals at each location. This quantity and distribution provides a sound statistical basis for analysis of background characteristics.

Section 6.2.3, para. 1 (page 27)--In reference to Table 1 (Analytical Parameters and Methods), the statistical analyses for radionuclides should include a complete gamma spectroscopic analysis rather than gross alpha and gross beta testing alone. Gross alpha and beta testing would appear to have limited usefulness since radionuclide identification at background levels rather than gross screening is what is sought.

FEMP RESPONSE:

The analytical parameters for which collected samples will be analyzed has been revised and is reflected in Table 1 of the draft final sampling plan provided with this submittal. Analytical methods will be consistent with protocols utilized under the RI/FS program to date. Analytical detection limits are identified in Table 1 of the draft final work plan.

Section 6.2.3, para. 2 (page 27), sentence 2--It is stated that "if the distribution of analytical data is not statistically normal, a method will be identified and used to normalize the background for statistical comparisons". The normalization method should be defined such that a lower, more conservative background level is utilized.

FEMP RESPONSES:

A more thorough discussion of the proposed statistical methods to be utilized to evaluate background data is presented in the draft final sampling plan.

**FEMP RESPONSES TO
OHIO EPA COMMENTS**

**FEMP RESPONSES TO OHIO EPA COMMENTS ON THE FEMP BACKGROUND SAMPLING PLAN,
REVISION 0, SUBMITTED OCTOBER 1991.**

OHIO EPA GENERAL COMMENT 1:

Background concentrations of radiological and HSL parameters must be established for all media, including soils. DOE should refer to Ohio EPA, Division of Emergency and Remedial Response's "How Clean is Clean Policy," July 26, 1991, which contains a Background Sampling Guidance section.

FEMP RESPONSE:

This Background Sampling Plan is for soils only. The approach to be employed to establish background characteristics of other media is addressed in the Risk Assessment RI/FS Work Plan Addendum recently submitted to U.S. EPA and Ohio EPA. It should also be noted that on October 3, 1991 the FEMP received Approvals WITH MODIFICATIONS for the Closure Plans submitted to the Ohio EPA for Plant 6 Pad and Bulk Storage Tanks T5/T6. Through the Ohio EPA Approvals with modifications, the Director of the Ohio EPA has specifically required the FEMP Background Sampling Plan to conform to the May 1, 1991 OEPA Closure Plan Review Guidance. As a direct result of this requirement and subsequent telephone conversations with Ohio EPA, Division of Solid and Hazardous Waste, Southwest District Office, the FEMP Background Sampling Plan as submitted was not written to incorporate the Ohio EPA, Division of Emergency and Remedial Response's "How Clean is Clean Policy," July 26, 1991. The FEMP considers the draft final sampling plan to present a technically sound approach for establishing background characteristics of soils which fulfills the intent and minimum sampling requirements of all pertinent guidance.

OHIO EPA GENERAL COMMENT 2:

To avoid schedule delays, DOE should determine if there are any property access issues for primary and alternate background sampling locations as soon as the locations are approved by U.S. EPA and Ohio EPA.

FEMP RESPONSE:

The FEMP is well aware of the problems that can be encountered in gaining access to off-site properties. Standard procedures for obtaining access have been established through the RI/FS process. The process of obtaining access to the locations identified in the draft final plan was initiated following the January 16, 1992 meeting. The process is nearing completion as of the date of this submittal.

OHIO EPA GENERAL COMMENT 3:

The plan should contain a schedule for implementation of background sampling activities.

FEMP RESPONSE:

Additional work required pursuant to the Amended Consent Agreement does not specifically require the submittal of a proposed schedule for implementation. Every effort will be made to expedite the collection and analysis of samples required pursuant to the background sampling plan. Due to the expected low radionuclide concentrations in the collected samples and the required low detection limits, long turn around times are anticipated for analytes requiring alpha spectrometry analysis as a result of limited capacity at the receiving lab to perform such analyses. Based upon discussions with the subject lab, the maximum flow rate of samples through the lab for alpha spectrometry is anticipated to be 10 samples per week. Additionally the lab has indicated that an additional 60 days following the last analysis will be required to transfer the certificate of analysis forms and backup data packages to the site. On the basis of the 90 samples required per the work plan and the required quality assurance samples, a minimum of 7 months is anticipated to be required to complete all analysis required under the work plan and return the data to the site for validation following mobilization. Every effort is being made to redirect other work to other labs to reduce turnaround times to the maximum extent practical. On the basis of existing detailed schedules to support the Amended Consent Agreement, data from the background sampling program for soils will not be available to support the preparation of the Operable Unit 2 or 4 Remedial Investigation Reports. Literature values will be used in lieu of site specific data for these two reports. Every effort will be made to have the data available for inclusion in the Operable Unit 2 Feasibility Study Report.

OHIO EPA SPECIFIC COMMENT 1:

Section 1, Page 3, Table 1: In the draft Risk Assessment Work Plan (10/15/91), Table 4-2 lists radionuclides and hazardous chemicals in environmental media or operable unit source terms. Additional analytical parameters that should be included in the Background Sampling Plan are as follows: Actinium-227, Neptunium-237, Protactinium-231, Plutonium-238, Plutonium-239/240, Radon-220, Radium-224, and Sodium.

FEMP RESPONSE:

The proposed list of analytes for the collected samples has been revised to consider other constituents and to be consistent with the technical approach presented in the Risk Assessment RI/FS Work Plan Addendum. Actinium-227 and Radium-224 have been included on the Table 1 in the draft final sampling plan and will be analyzed for in collected soil samples. Radon-220 will not be analyzed for, but rather will be assumed to be in secular equilibrium with Radium-224. The other listed radionuclides will not be analyzed for in collected samples. Background concentrations of these radionuclides (i.e. Neptunium-237, etc.) will be assumed to be zero for purposes of performing risk assessments under the RI/FS

program. FEMP could identify no basis for analyzing collected samples from the program for sodium.

OHIO EPA SPECIFIC COMMENT 2:

Section 2.1, Page 4: The plan should describe how historical information was used to identify potential background sampling locations.

FEMP RESPONSE:

The sampling plan has been revised to include a discussion of pertinent historical information including the morphology of the area and past sampling events.

OHIO EPA SPECIFIC COMMENT 3:

Section 2.1.1, Page 5: Several questions arise from use of construction data from 1951: a) How was the 1951 data collected? b) What information from the 1951 data will be compared to off-site data? Is this information suitable for comparison purposes? c) What criteria will be used to be able to state that an on-site area is comparable to an off-site area? These criteria should also be stated in detail in Section 2.2 (see paragraph 4, page 6).

FEMP RESPONSE:

The background sampling plan for soils has been revised to examine the bulk characteristics of the unsaturated glacial overburden. This revised technical approach precludes the need for a discussion of the 1951 pre-construction data.

OHIO EPA SPECIFIC COMMENT 4:

Section 2.1.2, Page 5: Provide a soil survey map for the FEMP Site. The area of the map must include the "Site" as defined in the Amended Consent Agreement. Provide a description of the soil types in the text.

FEMP RESPONSE:

The draft final sampling plan presents a summary discussion of the geologic background of the site sufficient to support the revised technical approach adopted in the plan. Based upon this revised technical approach, a detailed presentation of a soil survey map for the site is no longer pertinent and has not been included in the draft final plan.

OHIO EPA SPECIFIC COMMENT 5:

Section 2.1.2, Page 5: On-site soils may have been considerably disturbed, removed, and/or covered with other materials during construction and use of the site. Soil types may not correspond to USDA/SCS Soil Survey data. Describe how background comparisons will be determined for these areas.

FEMP RESPONSE:

FEMP concurs with the Ohio EPA comment in that site soils have been significantly disturbed and generally cannot be expected to correlate to off-site SCS soil survey classifications. The technical approach for identifying and collecting the background soil samples has been modified to accommodate this consideration.

OHIO EPA SPECIFIC COMMENT 6:

Section 2.2 Selection of Background Sample Locations: The Ohio EPA Background Sampling Guidance is only guidance. The initial number of samples needed to adequately assess background concentrations stated in Ohio EPA guidance is seven. This number was calculated using well known statistical formulas. If DOE does not agree with the number of samples needed then they can select a different value for the number of background samples needed to be analyzed. However, the number chosen must be statistically defensible for determining background concentrations.

FEMP RESPONSE:

Samples will be collected from 3 discrete depths at 30 locations. This quantity of samples will provide a sound statistical basis for establishing background characteristics. The plan has been modified to provide a more thorough discussion of planned statistical analyses.

OHIO EPA SPECIFIC COMMENT 7:

Section 2.2, Page 6, First Paragraph: Provide a legible background sample location map including a scale, legend, and north arrow (Attachment 6). Provide legible copies of Attachments 7a and 7b.

FEMP RESPONSE:

An improved map has been provided in the draft final plan.

OHIO EPA SPECIFIC COMMENT 8:

Section 2.2, Page 6, First Paragraph: Background samples must be collected for each soil type (not just the major soil classification) found at the FEMP Site. Sample locations 1, 4, and 6 appear to be located very close to roads. Sample location 2 appears to be located very close to the Whitewater River, and locations 3 and 6 appear to be near the river. Explain the rationale for selecting these locations and explain the effect of roads and the river on these locations.

FEMP RESPONSE:

The revised approach for collecting the background soil samples involves examining the bulk characteristics of the glacial overburden. As presented in the draft final plan, proposed sampling locations have been repositioned away from roads, railroad tracks, etc., to minimize the potential impacts of mans activities on the sampling program.

OHIO EPA SPECIFIC COMMENT 9:

Section 2.2, Page 6: The plan should specify the criteria for determining similarity between FEMP and background soils. What physical properties will be used? What procedures will be used to assess these properties in the field? The ranges of these properties should be listed for each FEMP soil type.

FEMP RESPONSE:

As previously discussed, the sampling approach has been modified to preclude the need for directly correlating soil classifications from on-site to off-site background locations.

OHIO EPA SPECIFIC COMMENT 10:

Section 2.2, Page 7, Paragraph 2: Personal interview with the farmers will not guarantee that the soil sampling locations have not been exposed to high levels of herbicides and pesticides. As a result, the soil samples should be analyzed for these parameters to ensure true representative background samples.

FEMP RESPONSE:

The revised sampling strategy has been designed to permit an evaluation of the effects of weathering and mans activities on background soil characteristics. Pesticides and herbicides will not be analyzed for in samples collected under this program. The background contribution for these man-made contaminants will be assumed to be zero for purposes of the risk assessments performed in support of the ongoing RI/FS. Additional discussion on this issue can be found in the comment responses and revised submittal for the Risk Assessment RI/FS Work Plan Addendum.

OHIO EPA SPECIFIC COMMENT 11:

Section 2.2, Page 7, Paragraph 1: Property owners should be asked about fertilizer application on their properties. This section should also address how historical uses of the property will be determined.

FEMP RESPONSE:

See response to Ohio EPA Specific Comment 10. The revised sampling approach provides a sound technical basis for evaluating the impacts of mans activities on the background characteristics of soils at the proposed sampling locations.

OHIO EPA SPECIFIC COMMENT 12:

Section 2.2, Page 2, Paragraph 2: Explain the rationale for collecting four samples at each location. The Background Sampling Guidance referenced in General Comment #1 contains a section on selecting the appropriate number of background samples. The guidance states (page 14) that the number of samples proposed for collection for initial background sampling is seven.

FEMP RESPONSE:

As discussed in the revised plan, 3 discrete samples will be collected at 30 random locations.

OHIO EPA SPECIFIC COMMENT 13:

Section 2.2, Page 9, Paragraph 3: It is unclear to Ohio EPA why only the 0-6 inch sample will be analyzed for radionuclides. This zone is most susceptible to fugitive eolian deposits from the facility. If the purpose of the sampling is to find the background concentrations of radionuclides in the soils of the Fernald area, then all 3 proposed sampling depths should be analyzed.

FEMP RESPONSE:

FEMP agrees with the comment. The draft final work plan provides for radionuclide analysis from all collected soil samples.

OHIO EPA SPECIFIC COMMENT 14:

Section 3, Page 8: The plan should state that the site-wide QAPP will be followed if it is approved at the time of implementation of background sampling. Alternatively, the RI/FS QAPP, Revision 3 will be used, incorporating U.S. EPA and Ohio EPA comments.

FEMP RESPONSE:

The plan was written to be consistent with both the RI/FS QAPP and the proposed Site-wide Quality Assurance Project Plan.

OHIO EPA SPECIFIC COMMENT 15:

Section 3.2, Page 9, Paragraph 3: All samples should be analyzed for radionuclides. The background sampling plan must determine background concentrations of radionuclides for all soil types, not just the top 6 inches at a location.

FEMP RESPONSE:

The sampling approach has been modified to provide for radionuclide analysis on all collected samples.

OHIO EPA SPECIFIC COMMENT 16:

Section 3.2, Page 9: To increase comparability, the same sample intervals within each lithologic zone should be collected from each of the 4 borings at any one site.

FEMP RESPONSE:

The revised sampling approach precludes the need to examine discrete lithologic zones. Sampling will focus on the bulk characteristics of the glacial overburden.

OHIO EPA COMMENT 17:

Section 3.3, Page 10: In step 6, there is no mention of a homogenization step before soil sample containers are filled. Homogenization is necessary to obtain a representative sample from the sample interval. Additionally, it creates a more representative sample for duplicate analyses.

FEMP RESPONSE:

Since radom sampling is being conducted in a background area, FEMP considers that homogenization is not required prior to placing the soil in the sample containers. Homogenization does take place at the receiving laboratory prior to analysis.

OHIO EPA SPECIFIC COMMENT 18:

Section 3.5.2, Page 14: The decontamination procedures described are not sufficient for decontamination of equipment used to collect background samples for radionuclides and inorganics. Use the Level III decontamination procedure described in the draft site-wide QAPP, Appendix J.4.7.2. Do not use aluminum foil to cover decontaminated equipment.

FEMP RESPONSE:

The field equipment decontamination procedure has been revised to accommodate this comment. Aluminum foil will not be used to cover decontaminated equipment.

OHIO EPA SPECIFIC COMMENT 19:

Section 3.5.2, Decontamination Procedures: An acid rinse must be used in the decontamination of sampling equipment. Please refer to the Technical Enforcement Guidance Document (TEGD, Sept. 1986) for specific decontamination procedures and rewrite this section to reflect this change.

FEMP RESPONSE:

The equipment decontamination protocol has been revised to include an acid rinse.

OHIO EPA SPECIFIC COMMENT 20:

Section 5.1, Page 19: Collect one rinseate sample for every 10 samples that are collected. (This issue was previously addressed as an Ohio EPA comment [August 5, 1991 letter] on the RI/FS QAPP, Revision 3).

FEMP RESPONSE:

The draft final sampling plan provides for the collection of one rinseate sample per day or one for every 10 samples collected, whichever is greater.

OHIO EPA SPECIFIC COMMENT 21:

Section 5.1, Page 20: Is a Preservation Blank necessary? The only samples receiving preservative are the QC samples.

FEMP RESPONSE:

No preservation blank will be collected to support the background soil sampling program.

OHIO EPA SPECIFIC COMMENT 22:

Section 5.1, Page 21: Is the Material Blank the detergent or deionized water? Doesn't the Rinsate Sample address this QC issue.

FEMP RESPONSE:

The Quality Control sampling requirements for the program have been revised as identified in the draft final sampling plan. The revised plan provides for the collection of blanks from the acid, methanol, and water used for decon.

OHIO EPA SPECIFIC COMMENT 23:

Section 5.2, Page 22, Paragraph 1: The laboratory used for analysis of background samples must be approved by U.S. EPA for conducting analyses for the RI/FS.

FEMP RESPONSE:

All samples collected under the background sampling program will be analyzed at a laboratory approved for use on the RI/FS.

OHIO EPA SPECIFIC COMMENT 24:

Section 5.2, Page 23: Sample Temperature (at the time of sample log in at the laboratory) should be added to the list of information to be recorded for Chain-of-Custody records.

FEMP RESPONSE:

On basis of the types of samples to be collected under the background sampling program, FEMP could identify no basis for collecting temperature information.

OHIO EPA SPECIFIC COMMENT 25:

Section 6.2.3, Page 27: This section is too general. Specific details must be discussed, including determining normality of data (especially with such a small data set), transforming data that is not normal, and data analysis to determine anomalies. Data should not be statistically compared between different soil types or different lithologies (see paragraph 2).

FEMP RESPONSE:

The draft final work plan has been revised to provide a more thorough discussion of planned statistical analyses.

OHIO EPA SPECIFIC COMMENT 26:

Attachment 6: DOE does not state the location of the soil samples in relation to the prevailing wind direction and the facility. The background samples must be located up-wind of the facility.

FEMP RESPONSE:

The draft final work plan has been revised to accommodate this comment.