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**COMMENT RESPONSES TO OHIO EPA ON  
SAMPLING AND ANALYSIS PLAN FEMP OPERABLE  
UNIT 2 SEPTEMBER 1992**

09-01-92

**3  
COMMENTS**

*Comment Responses  
to  
Ohio EPA  
on*

**SAMPLING  
AND  
ANALYSIS PLAN**

FEMP OPERABLE UNIT 2

SEPTEMBER 1992

- 1 ▶ **COMMENT:** SECTION A.2.0  
Before the Simulated Rainwater Leach Procedure (SRLP) test is used, it must be validated. A determination of whether the test will produce a "leachate" equivalent to that produced in the ground must be made. DOE should use one of the waste sites where leachate is present and run the SRLP on a sample and compare the two liquids.

**Response:** SRLP analysis typically did not reach equilibrium during the specified nine-day leaching period. Therefore, the data is not used in the OU 2 Remedial Investigation (RI) Report. Other methods of estimating contaminant concentration in the leachate are being employed, including: (1) adoption of TCLP results as estimates of contaminant concentrations, (2) adoption of solubility limits on contaminant concentrations, and (3) use of the EPA 70-year rule. Since the use of SRLP data as representative of OU 2 leachate has not been established, and the SRLP is not critical to the OU 2 RI, the data will not be reported or used in the RI document.

**Action:** None required.

- 2 ▶ **COMMENT:** SECTION A.3.0, PAGE A-3, PARAGRAPH AFTER BULLET, SENTENCE 2  
Define the parameter "Eh".

**Response:** The parameter "Eh" refers to redox potential (the energy gained in the transfer of 1 mol of electrons from an oxidant to H<sub>2</sub>). Redox is short for oxidation - reduction reactions.

**Action:** None required.

- 3 ▶ **COMMENT:** SECTION A.4.2, PAGE A-3, LAST SENTENCE  
Procedures in the new site-wide Quality Assurance Plan (QAPjP) must be followed when the document is approved.

**Response:** Noted.

**Action:** None required.

- 4 ▶ **COMMENT:** SECTION A.5.5, PAGE A-6  
Procedures in the new site-wide QAPjP must be followed when the document is approved.

**Response:** Noted.

**Action:** None required.