

2847

**PROJECT SPECIFIC PLAN  
FOR AREA 2, PHASE III PART TWO  
CERTIFICATION SAMPLING**

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT  
FERNALD, OHIO**



**MARCH 15, 2000**

**U.S. DEPARTMENT OF ENERGY  
FERNALD AREA OFFICE**

**20460-PSP-0003  
REVISION A  
DRAFT**

**000001**

2847

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FOR AREA 2, PHASE III PART TWO  
CERTIFICATION SAMPLING**

**Document Number 20460-PSP-0003**

**Revision A  
Draft**

**March 15, 2000**

**APPROVAL:**

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Tom Crawford, Area 2 Project Manager  
Soil and Disposal Facility Project

Date

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Mike Rolfes, Area 2 Characterization Lead  
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Date

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Tom Buhrlage, Environmental Monitoring  
Soil and Water Project

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**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT**

**Fluor Fernald  
P.O. Box 538704  
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**TABLE OF CONTENTS**

1.0 Introduction ..... 1-1  
 1.1 Purpose ..... 1-1  
 1.2 Scope ..... 1-1  
 1.3 Key Personnel ..... 1-1

2.0 Certification Sampling Program ..... 2-1  
 2.1 Certification Design ..... 2-1  
 2.2 CU Sampling ..... 2-1  
 2.3 Surveying ..... 2-2  
 2.4 Physical Soil Sample Collection ..... 2-2  
     2.4.1 Certification Physical Sample Identification ..... 2-4  
     2.4.2 Certification Physical Sample Identification ..... 2-4

3.0 Certification Sample Analysis ..... 3-1

4.0 Quality Assurance/Quality Control Requirements ..... 4-1  
 4.1 Field Quality Control Samples, Analytical Requirements and Data Validation ..... 4-1  
 4.2 Project Specific Procedures, Documents and Manuals ..... 4-1  
 4.3 Independent Assessment ..... 4-2  
 4.4 Implementation of Changes ..... 4-2

5.0 Health and Safety ..... 5-1

6.0 Data Management ..... 6-1

Appendix A      Data Quality Objectives SL-052, Rev. 2  
 Appendix B      A2PIII Part Two CU Samples/Coordinates/Identification

### LIST OF TABLES

Table 1-1	Key Personnel
Table 3-1	Sampling and Analytical Requirements
Table 3-2	A2PIII Part Two Certification Sampling Target Analyte List

### LIST OF FIGURES

Figure 1-1	A2PIII Location Map
Figure 2-1	A2PIII Part Two Certification Units
Figure 2-2	A2PIII Part Two Sample Locations

**LIST OF ACRONYMS AND ABBREVIATIONS**

A2PIII	Area 2, Phase III
APM	Area Project Manager
ASL	analytical support level
CDL	Certification Design Letter
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
COC	constituent of concern
CU	certification unit
DQO	Data Quality Objectives
FACTS	Fernald Analytical Customer Tracking System
FAL	Field Activity Log
FEMP	Fernald Environmental Management Project
FRL	final remediation level
GIS	Geographical Information System
GPS	Global Positioning System
HAMDC	highest allowable minimum detection concentration
LAN	Local Area Network
MDC	minimum detection concentration
PSP	Project Specific Plan
QA/QC	Quality Assurance/Quality Control
RI	Remedial Investigation
RWP	Radiological Work Permit
SCQ	Sitewide CERCLA Quality Assurance Project Plan
SED	Sitewide Environmental Database
SEP	Sitewide Excavation Plan
SPL	Sample Processing Laboratory
SSOD	Storm Sewer Outfall Ditch
SWRB	Storm Water Retention Basin
TAL	Target Analyte List
V/FCN	Variance/Field Change Notice
WAO	Waste Acceptance Operations

## 1.0 INTRODUCTION

### 1.1 PURPOSE

The purpose of this Project Specific Plan (PSP) is to describe the certification sampling and analysis necessary to certify Area 2, Phase III (A2PIII) Part Two soil. Certification demonstrates that risk-based area-specific constituents of concern (ASCOCs) meet final remediation levels (FRLs). A2PIII Part Two consists of approximately 5 acres of land located just south of the Storm Water Retention Basin (SWRB) east chamber (see Figure 1-1). The area has remained relatively non-impacted by former production operations due to its perimeter location. However, an area of radium-226 contamination above-FRL concentrations was encountered during precertification in February/March 1999. This area was further delineated with physical samples in Spring and Summer 1999 to design remediation.

Excavation of the radium-226 "hot spot" area will commence in Spring 2000. Upon completion of this excavation and precertification of the remediated footprint, certification sampling will commence.

### 1.2 SCOPE

This PSP covers all physical sampling associated with A2PIII Part Two certification. The certification design is consistent with the Certification Design Letter (CDL) for A2PIII Part Two. All sampling and analysis activities will be as consistent as possible with the Sitewide Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Quality Assurance Project Plan (SCQ), Section 3.4 of the Sitewide Excavation Plan (SEP), and Data Quality Objectives (DQO) SL-052, Revision 2.

DQO SL-052 is included as Appendix A of this PSP.

### 1.3 KEY PERSONNEL

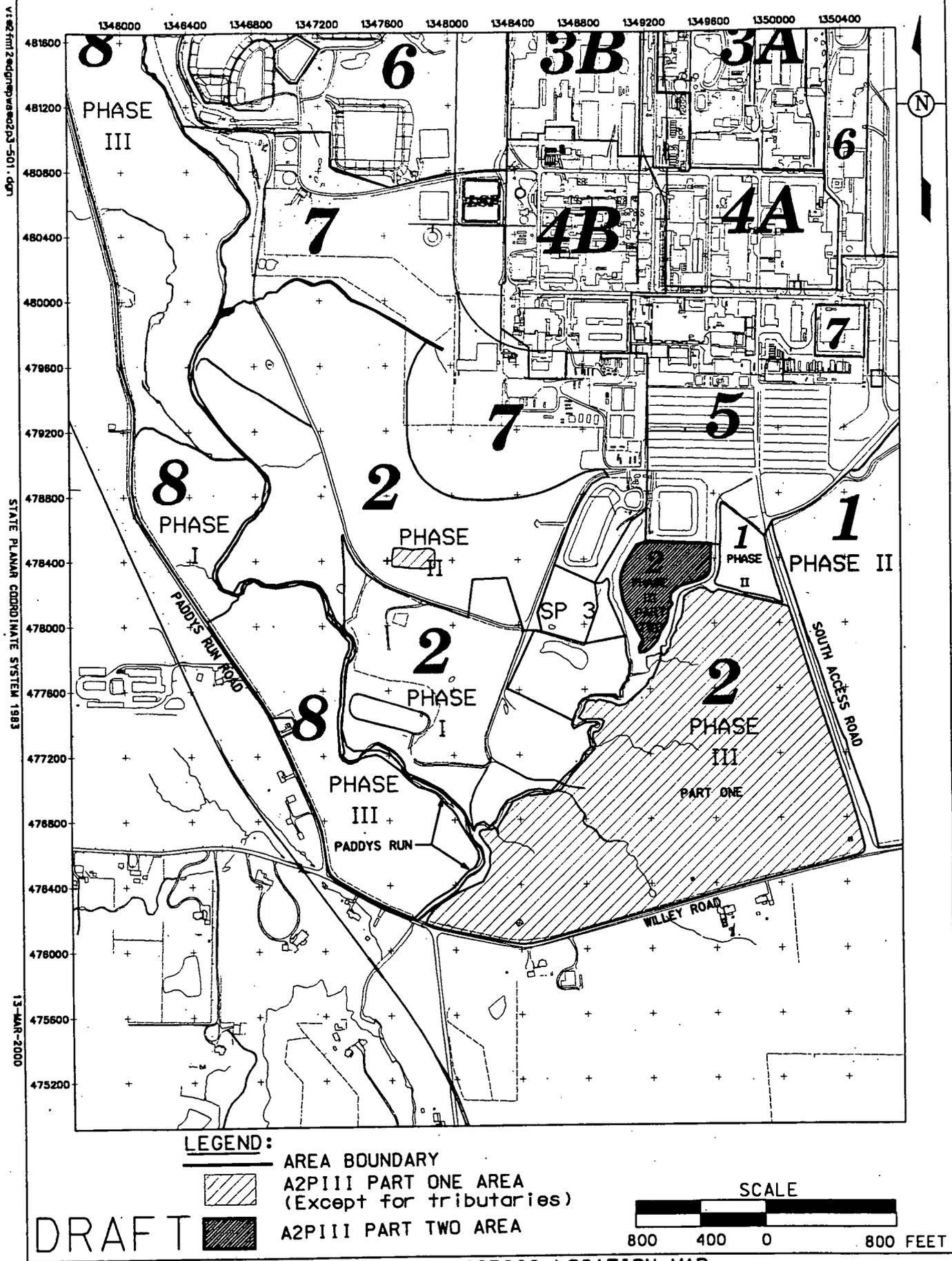
Key personnel responsible for performance of the project are listed in Table 1-1.

**TABLE 1-1**  
**KEY PERSONNEL**

<b>Title</b>	<b>Primary</b>	<b>Alternate</b>
DOE Contact	Rob Janke	Kathi Nickel
Area Project Manager	Tom Crawford	Jyh-Dong Chiou
Characterization Lead	Mike Rolfes	John Centers
Field Sampling Lead	Tom Buhrlage	Jim Hey
Surveying Lead	Jim Schwing	Jim Capannari
Waste Acceptance Operations (WAO) Contact	Linda Barlow	TBD
Laboratory Contact	Audrey Hannum	Grace Ruesink
Data Validation Contact	Jim Chambers	Jim Cross
Data Management Contact	Deanna Diallo	Mike Rolfes
Quality Assurance Contact	Reinhard Friske	Mary Eleton
Health and Safety Contact	Debra Grant	Lewis Wiedeman

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**LEGEND:**

-  AREA BOUNDARY
-  A2PIII PART ONE AREA (Except for tributaries)
-  A2PIII PART TWO AREA

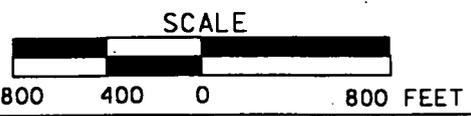


FIGURE 1-1. A2PIII LOCATION MAP

## 2.0 CERTIFICATION SAMPLING PROGRAM

### 2.1 CERTIFICATION DESIGN

Details and logic of the certification design for A2PIII Part Two are described in the A2PIII Part Two CDL. The certification design and sampling strategy follows Section 3.4 of the SEP. The A2PIII Part Two certification areas consists of the following:

- Two Group 1 certification units (CUs) one for the excavated radium-226 footprint and one for the northeast area, expected to disturbed during the hauling of impacted material during excavation (as described in Section 4.1.1 of the A2PIII Part Two CDL).
- One Group 2 CU for the southern perimeter, non-impacted area (as described in Section 4.1.1 of the A2PIII Part Two CDL).

If the radium-226 excavation footprint is modified from the design and/or modified due to elevated precertification scanning results, the CU designs will be re-evaluated. Any CU changes deemed necessary based on this evaluation will be documented in the final version of the PSP.

### 2.2 CU SAMPLING

Two Group 1 (which can be as large as 62,500 square feet) and one Group 2 CU (which can be as large as 250,000 square feet) are identified and depicted in Figure 2-1. The Group 1 CUs cover the perimeter around the excavation footprint and the area expected to be partially impacted during excavation (truck turnaround, loading area, and equipment laydown area). The Group 2 CU for the southern perimeter, non-impacted area is bounded by the Storm Sewer Outfall Ditch (SSOD) and the unnamed tributaries and extends only partially down the side banks to allow for potential backup during extreme rain events and flooding. The streambeds and lower side banks are excluded from this certification event and will be certified at a later date with the dirty corridors.

Certification sampling consists of the collection of 16 randomly selected physical soil samples within each CU per Section 3.4.2.1 in the SEP. The sample locations are generated by dividing each CU into 16 approximately equal sub-CUs. Randomly selected easting and northing coordinates are generated within each sub-CU boundary. The selected locations must also meet the minimum distance criterion, defined as the minimum distance allowed between random sample locations, in order to eliminate the chance of random sample points clustering within a small area. The minimum distance criterion is

1 discussed in detail in Section 4.1 of the A2P3 Part Two CDL. Additional alternative random sample  
2 locations are also generated in case the original random sample location does not meet the minimum  
3 distance criterion. If this is the case, then the first alternative location is selected and all the locations are  
4 re-tested against the minimum distance criterion. The process is continued until all 16 random locations  
5 in each CU meet that criterion. Random number generation is used to determine which samples are  
6 archived and which duplicate samples are collected.

7  
8 Of the 16 samples to be collected, a total of 12 will be submitted for analysis. In order to determine  
9 which samples to analyze while still providing sufficient area coverage, each CU is divided into  
10 quadrants, with each quadrant containing four sample locations. Three of the four samples from each  
11 quadrant are then randomly selected for analysis, resulting in a total of 12 samples analyzed per CU. The  
12 other four samples from each CU, as shown in Appendix B, are to be archived and will be analyzed only  
13 if necessary. If archived samples are analyzed, a Variance/Field Change Notice (V/FCN) will be  
14 generated listing the archives pulled for analyses and the appropriate Target Analyte List (TAL).  
15 Figure 2-2 and Appendix B list all the samples per CU including coordinates and analytical disposition.  
16 See Table 3-1 for TAL parameters.

### 17 18 2.3 SURVEYING

19 The NAD83 State Planar coordinates have been determined for each sample location, listed in  
20 Appendix B. Before collection, sample locations (including the elevations) will be identified and flagged  
21 using standard land surveying methods. If surface features prevent the collection of soil samples at the  
22 planned location, the sample location may be field adjusted to accommodate safe and reasonable sample  
23 locations but may not cross CU boundaries. Any sample location moved more than 3 feet from the  
24 planned location must be approved by the Agencies and documented in a V/FCN.

### 25 26 2.4 PHYSICAL SOIL SAMPLE COLLECTION

27 All soil samples will be collected using a 3-inch x 6-inch long diameter plastic or stainless steel liner and  
28 will be sealed using plastic end caps, as identified in procedure SMPL-01. A variety of sampling  
29 equipment and methods will potentially be utilized for sampling locations dependent on the surface  
30 conditions. More specifically, the surface soil sampling locations in areas covered by grass will be  
31 sampled using a 3-inch diameter plastic or stainless steel liner or hand auger. For surface soil sample  
32 locations in any gravel areas, either a Geoprobe® core sampler (Macro-core tool) or hand auger will be

1 used to penetrate the gravel to reach the original surface soil. At the discretion of the Field Sampling  
2 Lead, samples may be collected using other methods with concurrence from the Characterization Lead as  
3 specified in SMPL-01.

4  
5 Prior to collection of the soil cores, the field sampling technician will remove all surface vegetation  
6 within a 6-inch radius of the points to be sampled using a blue nitrile glove or stainless steel trowel,  
7 taking care not to remove any of the surface soil. Regardless of the sample collection apparatus, the  
8 surface soil samples will be collected from the 0 to 6-inch interval at each location. If a sample point is  
9 located within the footprint of a gravel/paved pad or road, the sample will be taken to a depth of 6 inches  
10 below the gravel/asphalt base. For duplicate samples to meet the quality control requirements, twice the  
11 sample volume will be collected at those sample locations (identified in Appendix B). These duplicate  
12 soil samples will be collocated within a 1 foot radius and not composited. All samples, including  
13 duplicates, will be assigned a unique sample identification number as identified in Section 2.3.2 and  
14 Appendix B.

15  
16 If surface or subsurface obstacles prevent sample collection at any of the original locations identified in  
17 Appendix B, the location may be moved up to three feet in radius from the original location. The  
18 distance and direction moved will be noted on the Field Activity Log (FAL). If any certification  
19 sampling location is moved, it must remain within the boundary of the same sub-CU. Customer sample  
20 numbers and Fernald Analytical Customer Tracking System (FACTS) identification numbers will be  
21 assigned to all samples collected. The sample labels will be completed with sample collection  
22 information, and technicians will complete a FAL, Sample Collection Log, and Chain of  
23 Custody/Request for Analysis; this documentation is to be completed in the field prior to submitting the  
24 samples.

25  
26 All samples collected from one CU (including duplicate samples) will be batched and submitted to the  
27 Sample Processing Laboratory (SPL) on one Chain of Custody form as one analytical release. Water QC  
28 samples will be submitted with the associated CU at the time of collection. Archive samples (see  
29 Appendix B) will be kept under the Chain of Custody of the field crew and will not be submitted to the  
30 SPL. Upon completion of sample collection, boreholes will be collapsed.

1 2.4.1 Equipment Decontamination

2 Decontamination is performed to protect worker health and safety and to prevent the introduction of  
3 contaminants from sampling equipment to subsequent soil samples. Field technicians will ensure that  
4 sampling equipment has been decontaminated prior to transport to the field sampling site.

5 Decontamination is only necessary in the field when sampling equipment is reused. Push tubes and core  
6 tube end caps require decontamination prior to use. If an alternate sampling method is used, equipment  
7 will be decontaminated between collection of sample intervals and again after the sampling performed  
8 under this PSP is completed. Equipment that comes into contact with the sample will be decontaminated  
9 at Level II (Section K.11 of the SCQ) in the field. Clean disposable wipes may be used to replace air  
10 drying of the equipment.

11  
12 2.4.2 Certification Physical Sample Identification

13 Each certification soil sample will be assigned a unique sample identification code, as follows:

14  
15 *A2P3-PT2-C-CU-Location-Suite-QC*, where:

16  
17 A2P3 = Sample collected from Remediation Area 2, Phase III (Note that the number "3"  
18 is used in place of the roman numeral "III" in the ID number for data  
19 management purposes)  
20 C = Certification Sample  
21 CU = Certification unit  
22 Location = Sample location number within each CU (1 through 18)  
23 Suite = "R", for radiological, "V" for archive  
24 QC = Quality control sample, if applicable. A "D" indicates a duplicate sample,  
25 "X" indicates a rinsate, "Y" indicates a container blank sample.  
26

27 Therefore, a duplicate sample taken from the 15th sample location from within CU-1 would be identified  
28 as A2P3-PT2-C-1-15-R-D.

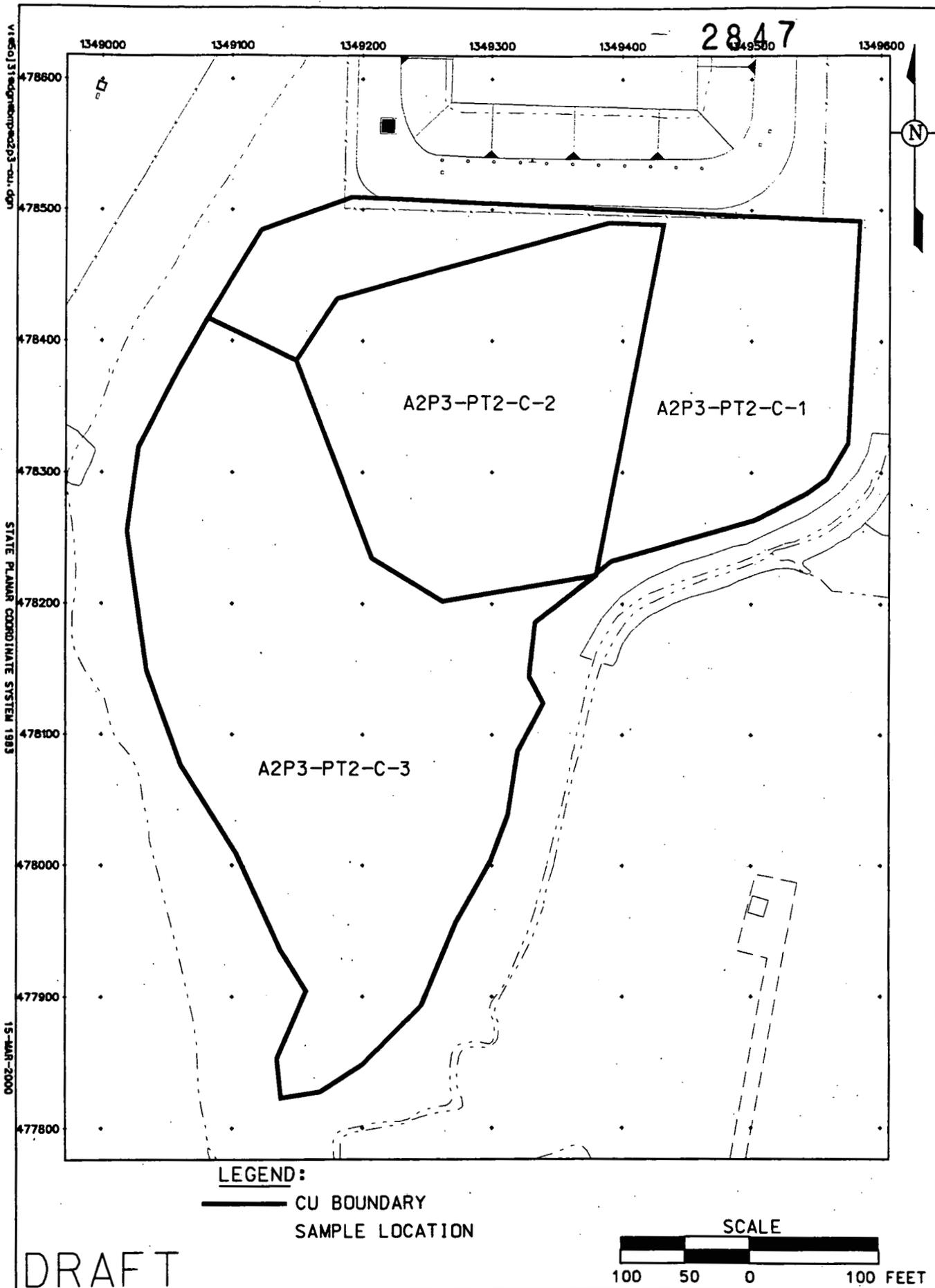


FIGURE 2-1. A2P3 PART TWO CERTIFICATION UNITS

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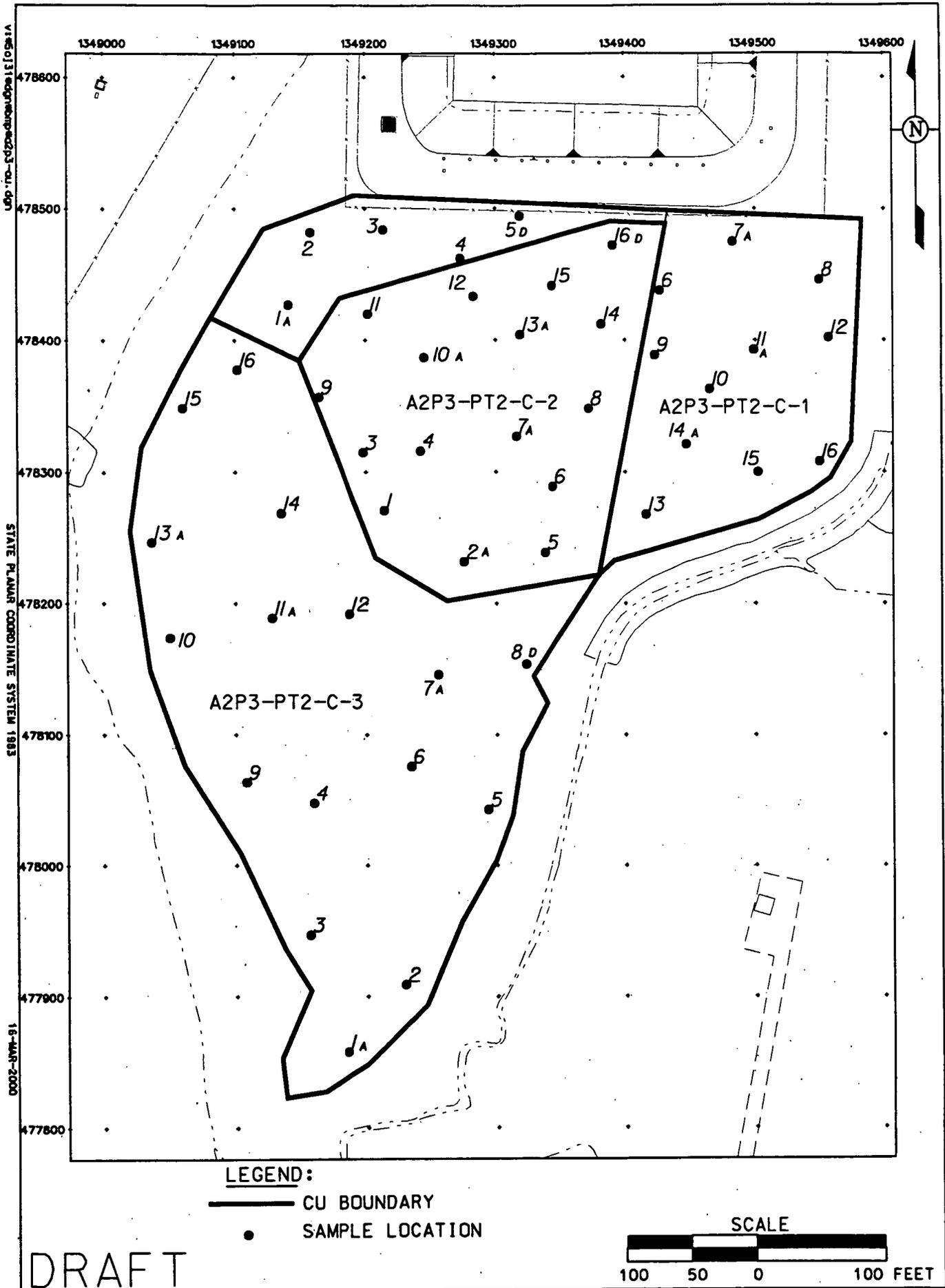


FIGURE 2-2. A2PIII PART TWO SAMPLE LOCATIONS

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1 **3.0 CERTIFICATION SAMPLE ANALYSIS**

2  
3 The necessary volume of all samples collected will be prepared for the appropriate analytical method per  
4 requirements of the SCQ. Sampling and analytical requirements are listed in Table 3-1. The TAL is  
5 shown in Table 3-2.

6  
7 If the Area Project Manager (APM) decides to analyze samples subject to methods not described in the  
8 SCQ, the APM shall ensure that:

- 9
- 10 • A variance is issued to include references confirming that the new method is sufficient to  
11 support data needs
  - 12 • Variations from the SCQ methodology are documented in the PSP, or
  - 13 • The APM may request data validation for affected samples or communicate to the lab  
14 that Data Qualifier Codes of J and R be attached to detected and non-detected  
15 constituents of concern, respectively.  
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**TABLE 3-1  
 SAMPLING AND ANALYTICAL REQUIREMENTS**

Analyte	Method	Sample Matrix	Lab	ASL	Preserve	Holding Time	Container	Sample Mass
Total Uranium, Radium-226, Radium-228, Thorium-228, Thorium-232	Alpha or Gamma Spectroscopy	Solid	On-site or off-site	E*	None	12 months	Plastic glass or stainless steel core liner	300 grams
Total Uranium, Radium-226, Radium-228, Thorium-228, Thorium-232	Alpha or Gamma Spectroscopy	Liquid (rinsate/container blank)	On-site or off-site	E*	HNO <sub>3</sub> to pH<2	6 months	4 liter polyethylene	8 liters

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\* The SCQ highest allowable minimum detectable concentration (HAMDC) for total uranium, thorium-228, and thorium-232 by gamma spectroscopy at Analytical Support Level (ASL) D is more stringent the minimum detectable concentration (MDC) needed for this certification. The MDC needed for this certification event is 10 percent of the FRL. Thus, the data deliverable for total uranium, thorium-228, and thorium-232 analysis by gamma spectroscopy will be identical in specifications for ASL D except for the HAMDC. As a result, the total uranium, thorium-228, and thorium-232 gamma spectroscopy data are considered ASL E.

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**TABLE 3-2**  
**A2PIII PART TWO CERTIFICATION SAMPLING**  
**TARGET ANALYTE LIST**

**TAL 20460-PSP-0003-A**  
**Alpha or Gamma Spectroscopy Method**  
**(ASL D\*)**

Analyte	FRL Limit	MDC
Total Uranium	82 ppm	8 ppm
Thorium-228	1.7 pCi/g or ml	.17 pCi/g or L
Thorium-232	1.5 pCi/g or ml	.15 pCi/g or L
Radium-228	1.8 pCi/g or ml	.18 pCi/g or L
Radium-226	1.7 pCi/g or ml	.17 pCi/g or L

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11  
12  
13  
14  
15  
16

\* The SCQ HAMDC for total uranium, thorium-228, and thorium-232 by gamma spectroscopy at ASL D is more stringent the MDC needed for this certification. The MDC needed for this certification event is 10 percent of the FRL. Thus, the data deliverable for total uranium, thorium-228, and thorium-232 analysis by gamma spectroscopy will be identical in specifications for ASL D except for the HAMDC. As a result, the total uranium, thorium-228, and thorium-232 gamma spectroscopy data are considered ASL E.

#### 4.0 QUALITY ASSURANCE/QUALITY CONTROL REQUIREMENTS

##### 4.1 FIELD QUALITY CONTROL SAMPLES, ANALYTICAL REQUIREMENTS AND DATA VALIDATION

The field quality control, analytical, and data validation requirements are as follows:

- Field quality control requirements include one duplicate for each CU, as noted in Appendix B and further described in Section 2.4. Two container blanks will be collected - one before sample collection begins and one at the conclusion of sample collection - for the push tubes and end caps. If an alternate sample collection method is used, one rinsate will be collected at a minimum frequency of one per 20 certification samples where reusable equipment (e.g., hand augers, push tubes) is used for collection. All field QC samples will be analyzed per TAL 20460-PSP-0003-A.
- All analyses will be performed at ASL D with an exception for total uranium, thorium-228 and thorium-232. The analytical package for total uranium, thorium-228 and thorium-232 analysis by gamma spectroscopy will be identical in specifications for ASL D except for the HAMDC. As a result, the total uranium, thorium-228 and thorium-232 gamma spectroscopy data are considered ASL E.
- All field data will be validated. An ASL D analytical package will be provided for ten percent of the samples at a minimum and an ASL B package for 90 percent or less of the samples. At a minimum, ten percent of the analytical data will be validated to ASL D and ninety percent to ASL B. This will be obtained by validating the first CU submitted to the lab to ASL D. If any result is rejected, all data from the laboratory with the rejected result will then be validated to determine the integrity of the results from that laboratory. This change will be documented in a variance to this PSP.

Once all data are validated as required, results will be entered into the Sitewide Environmental Database (SED) and a statistical analysis will be performed to evaluate the pass/fail criteria for the each CU. The statistical approach is discussed in Section 3.4.3 and Appendix G of the SEP. This work is being performed per the requirements as stated in DQO SL-052 (Appendix A).

##### 4.2 PROJECT-SPECIFIC PROCEDURES, DOCUMENTS AND MANUALS

To ensure consistency and data integrity, field activities in support of the PSP will follow the requirements and responsibilities outlined in the procedures and guidance documents referenced below.

- ADM-02, Field Project Prerequisites
- EQT-33, Real Time Differential Global Positioning System Operation
- Sitewide CERCLA Quality Assurance Project Plan (SCQ)
- SMPL-01, Solids Sampling
- SMPL-21, Collection of Field Quality Control Samples

- 1           •       S.P. 766-S-1000, Shipping Samples to Offsite Laboratories
- 2           •       Trimble Pathfinder Pro-XL GPS Operation Manual
- 3           •       Sitewide Excavation Plan (SEP)
- 4           •       Certification Design Letter for A2PIII Part Two

5

6    4.3 INDEPENDENT ASSESSMENT

7    Independent assessment may be performed by the FEMP Quality Assurance (QA) organization by  
8    conducting a surveillance, consisting of monitoring/observing ongoing project activities and work areas  
9    to verify conformance to specified requirements. Surveillances will be planned and documented in  
10   accordance with Section 12.3 of the SCQ.

11

12   4.4 IMPLEMENTATION OF CHANGES

13   Before implementation changes, the Field Sampling Lead will be informed of the proposed changes.  
14   Once the Field Sampling Lead has obtained written or verbal approval (electronic mail is acceptable)  
15   from the APM, QA, and the Characterization Lead for the changes to the PSP, the changes may be  
16   implemented. Changes to the PSP will noted in the applicable field activity logs and on a V/FCN. QA  
17   must receive the completed V/FCN, which includes the signatures of the Characterization Lead,  
18   Sampling Manager, APM, and QA within seven working days of implementation of the change.

**5.0 HEALTH AND SAFETY**

1  
2  
3 Technicians will conform to precautionary surveys performed by personnel representing the Utility  
4 Engineer, Industrial Hygiene, and Radiological Control as applicable. All work performed on this  
5 project will be performed in accordance to applicable Environmental Monitoring project procedures,  
6 RM-0020 (Radiological Control Requirements Manual), RM-0021 (Safety Performance Requirements  
7 Manual), Fluor Fernald work permit, Radiological Work Permit (RWP), penetration permits, and other  
8 applicable permits. All personnel in the performance of their assigned duties require concurrence with  
9 applicable safety permits. A safety briefing will be conducted prior to the initiation of field activities.  
10

11 **All emergencies shall be reported immediately on extension 911, or to the Site Communications**  
12 **Center at 648-6511 (if using a cellular phone), or using a radio and contacting "CONTROL" on**  
13 **Channel 11.**

## 6.0 DATA MANAGEMENT

1  
2  
3 A data management process will be implemented to collect and manage certification information  
4 collected during the investigation. As specified in Section 5.1 of the SCQ, daily activities will be  
5 recorded on the FAL, with sufficient detail to be able to reconstruct a particular situation without reliance  
6 on memory. Sample Collection Logs will be completed according to procedure ADM-02.

7  
8 Electronically recorded data from the Geodimeter or Global Positioning System (GPS) will be  
9 downloaded to disks on a daily basis or as the project requires. Survey team members will review the  
10 data for completeness and accuracy and then download it onto the Local Area Network (LAN). Once on  
11 the LAN, the Data Management Contact will perform an evaluation of the coordinate data. Once  
12 complete, the data will be sent to the loader, where it will be loaded onto the Oracle system and an error  
13 log will be generated. The data will then be made available to users through both the Geographical  
14 Information System (GIS) and Microsoft Access Software. Survey field team members will retain all  
15 downloaded data on disk for future reference and archive.

16  
17 Field documentation, such as the FAL, Geodimeter Survey Files, the Sample Collection Log, and the  
18 Sample Request/Sample Analysis Chain of Custody Log will undergo an internal QA/QC review by the  
19 field team members. Copies will then be generated and delivered to the Data Management Contact, who  
20 will perform an evaluation of the data and create the appropriate links between the electronically  
21 recorded data and the paper-generated data. The paper-generated data will be sent to data entry  
22 personnel for input into the SED. Field logs may be completed in the field and maintained in loose-leaf  
23 form. The QA validation team will validate field packages.

24  
25 Analytical data from on-site and/or off-site laboratories will be reported in preliminary form to the  
26 Characterization Lead on at least a weekly basis. This will be done by the laboratory contact as soon as  
27 the data are available in the FACTS database. Following required validation of the data for each sample  
28 release, the data from that release will be reported to the Characterization Lead in a summary data report  
29 format. All analytical data will be entered into the SED with the appropriate qualifier.

30  
31 All records associated with this PSP should reference the PSP number and eventually be forwarded to  
32 Engineering/Construction Document Control to be placed in the project file.

**APPENDIX A**

**DATA QUALITY OBJECTIVES SL-052, REV. 3**

Control Number \_\_\_\_\_

**Fernald Environmental Management Project**

**Data Quality Objectives**

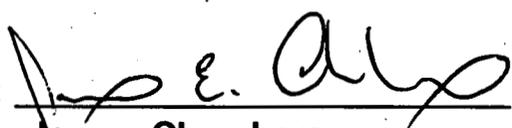
**Title: Sitewide Certification Sampling and Analysis**

**Number: SL-052**

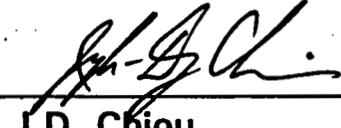
**Revision: 3**

**Effective Date: March 13, 2000**

**Contact Name: Mike Rolfes**

Approval:   
**James Chambers**  
**DQO Coordinator**

Date: 3/13/00

Approval:   
**J.D. Chiou**  
**SCEP Project Director**

Date: 3/13/00

<b>Rev. #</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>			
<b>Effective Date:</b>	4/28/99	6/10/99	2/3/00	3/13/00			

## **DATA QUALITY OBJECTIVES**

### **Sitewide Certification Sampling and Analysis**

#### **Members of Data Quality Objectives (DQO) Scoping Team**

The members of the scoping team included individuals with expertise in QA, analytical methods, field sampling, statistics, laboratory analytical methods and data management.

#### **Conceptual Model of the Site**

Soil sampling was conducted at the Fernald Environmental Management Project (FEMP) during the Operable Unit 5 (OU5) Remedial Investigation/Feasibility Study (RI/FS). Final Remediation Levels (FRLs) for constituents of concern (COCs), along with the extent of soil contaminated above the FRLs, were identified in the OU5 Record of Decision (ROD). Actual soil remediation activities now fall under the guidance of the final Sitewide Excavation Plan (SEP).

As outlined in the SEP, the FEMP has been divided into individual Remediation Areas (or phased areas within a Remediation Area) to sequentially carry out soil remedial activities. Under the strategy identified in the SEP, pre-design investigations are first conducted to better define the limits of soil excavation requirements. Following any necessary excavation, pre-certification real-time scanning activities are conducted to evaluate residual patterns of soil contamination. Pre-certification scan data should provide a level of assurance that the FRLs will be achieved. When pre-certification data indicate that remediation goals are likely to be met, they are used to define certification units (CUs) within the Remediation Area of interest. Table 2-9 of the final SEP identifies a list of area-specific COCs (ASCOCs) for each Remediation Area at the FEMP. Based on existing data and production knowledge, a subset of these ASCOCs are conservatively identified within each CU as potentially present in the CU. This suite of CU-specific COCs is the subset of the ASCOCs to be evaluated against the FRLs within that CU. At a minimum, the five primary radiological COCs (total uranium, radium-226, radium-228, thorium-228, thorium-232) will be retained as CU-specific COCs for certification of each CU.

Delineation and justification for the final CU boundaries, along with each corresponding suite of CU-specific ASCOCs is documented in a Certification Design Letter. Upon approval of the Certification Design Letter by the EPA, certification activities can begin. Section 3.4 of the final SEP presents the general certification strategy.

## 1.0 Statement of Problem

FEMP soil and potentially impacted adjacent off-property soil must be certified on a CU by CU basis for compliance with the FRLs of all CU-specific ASCOCs. The appropriate sampling, analytical and information management criteria must be developed to provide the required qualified data necessary to demonstrate attainment of certification statistical criteria. For every area undergoing certification, a sampling plan must be in place that will direct soil samples to be collected which are representative of the CU-specific COC concentrations within the framework of the certification approach identified in the final SEP. The appropriate analytical methodologies must be selected to provide the required data.

### Exposure to Soil

The cleanup standards, or FRLs, were developed for a final site land use as an undeveloped park. Under this exposure scenario, receptors could be directly exposed to contaminated soil through dermal contact, external radiation, incidental ingestion, and/or inhalation of fugitive dust while visiting the park. Exposure to contaminated soil by the modeled receptor is expected to occur at random locations within the boundaries of the FEMP and would not be limited to any single area. Some soil FRLs were developed based on the modeled cross-media impact potential of soil contamination to the underlying aquifer. In these instances, potential exposure to contaminants would be indirect through the groundwater pathway, and not directly linked to soil exposure. Off-site soil FRLs were established at more conservative levels than the on-property soil FRLs, based on an agricultural receptor. Benchmark Toxicity Values (BTVs) are also being considered in the cleanup process by assessing habitat impact of individual BTVs under post-remedial conditions.

### Available Resources

**Time:** Certification sampling will be accomplished by the field sampling team prior to interim or final regrading or release of soil for construction activities. The certification sampling schedule must allow sufficient time, in the event additional remediation is required, to demonstrate certification of FRLs prior to permanent construction or regrading. Certification sampling will have to be completed and analytical results validated and statistical analysis completed prior to submission of a Certification Report to the regulatory agencies.

**Project Constraints:** Certification sampling and analytical testing must be performed with existing manpower, materials and equipment to support the certification effort. Remediation areas are prioritized for certification sampling and analysis according to the date required for initiation of sequential construction activities in those areas. Fluor Daniel Fernald (FDF) and DOE must demonstrate post-remedial compliance with the CU-specific COC FRLs to release the designated Remediation Area for

planned interim grading, eventual restoration under the Natural Resources Restoration Plan (NRRP), and other final land use activities.

## 2.0 Identify the Decision

### Decision

Demonstrate within each CU if all CU-specific COCs pass the certification criteria. These criteria are as follows: 1) The average concentration of each CU-specific COC is below the FRL and within the agreed upon confidence limits (95% for primary ASCOCs and 90% for secondary ASCOCs); and 2) the hot-spot criteria, that no result for any CU-specific COC is more than two times the associated soil FRL. The certification criteria are discussed in greater detail in Section 3.4.4 of the final SEP.

### Possible Results

1. The average concentration of each CU-specific COC is demonstrated to be below the FRLs within the confidence level, with no single result for any CU-specific COC greater than two times the associated FRL. The CU can then be certified as attaining remediation goals.
2. The average concentration of at least one CU-specific COC is demonstrated to be above the FRL at the given confidence level. The CU will fail certification and require additional remedial action, per Section 3.4.5 of the final SEP.
3. If a result(s) of one or more CU-specific COC is demonstrated to be at or above two times the FRL, the CU will fail certification. The CU will fail certification and require additional remedial action per Section 3.4.5 of the final SEP. A combination of results 2 and 3 also constitutes certification failure.

## 3.0 Inputs That Affect the Decision

### Required Information

Certification data will be obtained through physical soil sampling. Based on the certification analytical results, the average concentrations of each CU-specific COC with specified confidence levels will be calculated using the statistical methods identified in Appendix G of the final SEP.

### Source of Information

Per the SEP, analysis of certification samples for each CU-specific COC will be conducted at analytical support level (ASL) D in accordance with methods and QA/QC standards in the FEMP Sitewide CERCLA Quality Assurance Project Plan [SCQ].

#### Contaminant-Specific Action Levels

The cleanup levels are the soil FRLs published in the OU5 and OU2 RODs. BTVs being considered in the remediation process are discussed for consideration during certification in Appendix C of the NRRP.

#### Methods of Sampling and Analysis

Physical soil samples will be collected in accordance with the applicable site sampling procedures. Per the SEP, laboratory analysis will be conducted at ASL D using QA/QC protocols specified in the SCQ. Full raw data deliverables will be required from the laboratory to allow for appropriate data validation. For FEMP-approved on- and off-site laboratories, the analytical method used will meet the required precision, accuracy and detection capabilities necessary to achieve FRL analyte ranges.

### 4.0 The Boundaries of the Situation

#### Spatial Boundaries

Domain of the Decision: The boundaries of this certification DQO extend to all surface, stockpile and fill soil in areas that are undergoing certification as part of FEMP remediation.

Population of Soil: Soil includes all excavated surfaces, undisturbed relatively unimpacted native soil, and sub-surface intervals (stockpile or fill areas only) in areas undergoing certification sampling and analysis.

#### Scale of Decision Making

Based on considerations of the final certification units and the COC evaluation process, the CU-specific COCs are determined. The area undergoing certification will be evaluated on a CU basis, based on physical sample results, as to whether it has passed or failed the criteria for attainment of certification (final SEP Section 3.4.4).

#### Temporal Boundaries

Time frame: Certification sampling must be performed in time to sequentially release certified areas for scheduled interim grading, restoration, and other final land use activities. Certification sampling data received from the laboratory will be validated and statistically evaluated. Certification results and findings will be documented in Certification Reports, which must be submitted to and approved by the regulatory agencies prior to release of the areas for scheduled interim grading, restoration, and other final land use activities.

Practical Considerations: Some areas undergoing remediation will not be accessible for certification sampling until decontamination/demolition and remedial excavation activities are complete. Other areas, such as wood lots, that are relatively uncontaminated and not planned for excavation, may require preparation, such as cutting of grass or removal of undergrowth prior to certification sampling, thus requiring coordination with FEMP Maintenance personnel.

## 5.0 Decision Rule

Successful certification of soil within the boundaries of a certification unit (CU) demonstrates that the certified soil (surface or subsurface) has concentrations of CU-specific COC(s) that meet the established criteria for attainment of Certification.

### Parameters of Interest

The parameters of interest are the individual and average surface soil concentrations of CU-specific COCs and confidence limits on the calculated average within a CU. OU2 and OU5 ROD identify all applicable soil FRLs. The SEP identifies the ASCOCs, a subset of which will be used to establish CU-specific COCs within each Remediation Area undergoing certification sampling and analysis.

### Action Levels

The applicable action levels are the on- and off-property soil FRLs published in the OU5 or OU2 ROD for each ASCOC.

### Decision Rules

If the average concentration for each CU-specific COC is demonstrated to be below the FRLs within the agreed upon confidence level (95% for primary COCs; 90% for secondary COCs), and no analytical result exceeds two times the soil FRL, then the CU can be certified as complying with the cleanup criteria. If a CU does not meet the FRLs within the agreed upon confidence level for one or more CU-specific COCs, or one or more analytical results for one or more CU-specific COCs is greater than two times the associated soil FRL, then the CU fails certification and requires further assessment as per the SEP.

## 6.0 Limits on Decision Errors

### Types of Decision Errors and Consequences

#### Definition

Decision Error 1: This decision error occurs when the decision maker decides that a CU has met the certification criteria, when in reality, the certification criteria have not been met. This situation could result in an increased risk to human health and the environment. In addition, this type of error could result in regulatory fees and penalties.

Decision Error 2: This decision error occurs when the decision maker decides a CU does not meet the certification criteria, when actually, the certification criteria have been met. This error would result in unnecessary added costs due to the excavation of soil containing COC concentrations below their FRLs, and an increased volume of soil assigned to the OSDF. In addition, unnecessary delays in the remediation schedule may result.

#### True State of Nature for the Decision Errors

The true state of nature for Decision Error 1 is that the certification criteria are not met (average CU-specific COC concentrations not below the FRL within the specified confidence limits; or a single sample result above two times the FRL). The true state of nature for Decision Error 2 is that certification criteria are met (average CU-specific COC concentrations are below the FRL within the specified confidence limits, and no result is above two times the FRL). Decision Error 1 is the more severe error due to the potential threat this poses to human health and the environment.

#### Null Hypothesis

$H_0$ : The average concentration of at least one CU-specific COC within a CU is equal to or greater than the associated FRL.

$H_1$ : The average concentration of all CU-specific COCs within a CU is less than the action levels.

#### False Positive and False Negative Errors

A false positive is Decision Error 1: less than or equal to five percent ( $p = .05$ ) is considered the acceptable decision error in determination of compliance with FRLs for primary ASCOCs, while ten percent ( $p = .10$ ) is acceptable for secondary ASCOCs.

A false negative is Decision Error 2: less than or equal to 20 percent is considered the acceptable decision error. This decision error is controlled through the determination of sample sizes (see Section G.1.4.1 of the final SEP).

## 7.0 Design for Obtaining Quality Data

Section 3.4.2 of the final SEP presents the specifics of the certification sampling design. The following text describes the general certification sampling design.

### Soil Sample Locations

In order to select certification sampling locations, each CU is divided into 16 approximately equal sub-CUs. Certification sample locations are then generated by randomly selecting an easting and northing coordinate within the boundaries of each cell. Additional alternative sample locations are also generated in case the original random sample location fails the minimum distance criterion. The minimum distance criterion is defined as the minimum distance allowed between random sample locations in order to eliminate the chance of random sample points clustering within a small area. This clustering would tend to over emphasize a small area and, conversely, under represent a large area in certification determination. By not allowing sample locations to be too closely arranged, the sample locations are spread out and provide a more uniform coverage, thus reducing the possibility of large unsampled areas. The equation for determining minimum distance criterion is presented in Section 3.4.2.1 of the SEP.

In the event that the original random sample location failed the minimum distance criterion, the first alternate location was selected and all the locations were retested. This process continued until all 16 random locations passed the minimum distance criteria.

Each CU is also divided into four quadrants, each of which contains 4 sub-CUs and 4 sample locations. Three of the four locations per quadrant (12 per CU) are then selected for sample collection and analysis. The other one per quadrant (4 per CU) are designated as "archives", and samples will not be collected and analyzed unless need arises due to analytical or validation problems warrant. Per Section 3.4.2 of the SEP, as few as 8 samples may be collected from Group 2 CUs for analysis of secondary COCs.

### Physical Samples

Physical soil certification samples will be collected from the surface according to SMPL-01 at locations identified in the PSP (generally 12 of the 16 locations per CU).

If stockpiled soil is to be certified, two CUs will be established, one for the stockpile and one for the underlying soil (i.e., the "footprint"). To certify the stockpile, samples will be collected from predetermined random intervals from within the stockpiled soil at each certification sampling location identified in the PSP. To certify the footprint, the first 6-inches of native soil present at each sampling location will also be collected for certification. If fill soil is to be certified, the strategy (surface or sampling at depth) will be based on results from the precertification scan of the fill area(s), as discussed in the Certification Design Letter and the certification PSP.

#### Laboratory Analysis

As defined in the PSP, a minimum of 8 to 12 samples per CU will be submitted to the on-site laboratory or a FDF approved off-site laboratory for analysis. All certification analyses will meet ASL D requirements per the SCQ except for the HAMDC. Samples will be analyzed for all CU-specific ASCOCs, with minimum detection levels set according to the SCQ and applicable project guidelines.

#### Validation

All field data will be validated. Also, a minimum of 10 percent of the analytical data from each laboratory will be subject to analytical validation to ASL D requirements in the SCQ, and will require an ASL D package. The remaining analytical data will be validated to a minimum of ASL B, and will require an ASL B package.

### **8.0 Use of Data to Test Null Hypothesis**

Appendix G of the final SEP discusses in detail, the statistical evaluations of certification data used to determine attainment of certification criteria.

000031

**Data Quality Objectives  
Sitewide Certification Sampling and Analysis**

1A. Task Description:

1B. Project Phase: (Put an X in the appropriate selection.)

RI  FS  RD  RA  RvA  Other (specify) \_\_\_\_\_

1C. DQO No.: SL-052, Rev. 2 DQO Reference No.: \_\_\_\_\_

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2. Media Characterization: (Put an X in the appropriate selection.)

Air  Biological  Groundwater  Sediment  Soil   
Waste  Wastewater  Surface Water  Other (specify) \_\_\_\_\_

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3. Data Use with Analytical Support Level (A-E): (Put an X in the appropriate Analytical Support Level selection(s) beside each applicable data use)

Site Characterization

A  B  C  D  E

Evaluation of Alternatives

A  B  C  D  E

Monitoring During Remediation

A  B  C  D  E

Risk Assessment

A  B  C  D  E

Engineering Design

A  B  C  D  E

Other

A  B  C  D  E

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4A. Drivers: Remediation Area Remedial Action Work Plans, Applicable or Relevant and Appropriate Requirements (ARARs) and Operable Unit 2 and Operable Unit 5 Records of Decision (ROD), Sitewide Excavation Plan (SEP).

4B. Objective: Confirmation that remediation areas at the FEMP, or adjacent off-property areas, have met certification criteria on a CU by CU basis.

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5. Site Information (Description):

The OU2 and OU5 RODs have identified areas at the FEMP that require soil remediation activities. The RODs specify that the soil in these areas will be demonstrated to be below the FRLs. Certification is necessary for all FEMP soil and some adjacent off-property soil to demonstrate that the residual soil does not contain COC contamination exceeding the FRL at a specified confidence level.

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6A. Data Types with appropriate Analytical Support Level Equipment Selection and SCQ Reference: (Place an "X" to the right of the appropriate box or boxes selecting the type of analysis or analyses required. Then select the type of equipment to perform the analysis if appropriate. Please include a reference to the SCQ Section.)

- |   |   |                                     |
|---|---|-------------------------------------|
| 1. pH <input type="checkbox"/>                    | 2. Uranium <input checked="" type="checkbox"/>        | 3. BTX <input type="checkbox"/>     |
| Temperature <input type="checkbox"/>              | Full Radiological <input checked="" type="checkbox"/> | TPH <input type="checkbox"/>        |
| Specific Conductance <input type="checkbox"/>     | Metals <input checked="" type="checkbox"/>            | Oil/Grease <input type="checkbox"/> |
| Dissolved Oxygen <input type="checkbox"/>         | Cyanide <input type="checkbox"/>                      |                                     |
| Technetium-99 <input checked="" type="checkbox"/> | Silica <input type="checkbox"/>                       |                                     |
| 4. Cations <input type="checkbox"/>               | 5. VOA <input checked="" type="checkbox"/>            | 6. Other (specify)                  |
| Anions <input type="checkbox"/>                   | BNA <input type="checkbox"/>                          |                                     |
| TOC <input type="checkbox"/>                      | PEST <input checked="" type="checkbox"/>              |                                     |
| TCLP <input type="checkbox"/>                     | PCB <input checked="" type="checkbox"/>               |                                     |
| CEC <input type="checkbox"/>                      | COD <input type="checkbox"/>                          |                                     |

\* As identified in the area certification PSP

6.B. Equipment Selection and SCQ Reference:

Equipment Selection	Refer to SCQ Section
ASL A _____	SCQ Section _____
ASL B _____	SCQ Section _____
ASL C _____	SCQ Section _____
ASL D <u>Per SCQ and PSP</u>	SCQ Section <u>Appendix G, Tbls. 1&amp;3</u>
ASL E <u>Per PSP</u>	SCQ Section <u>Appendix H (final)</u>

7A. Sampling Methods: (Put an X in the appropriate selection.)

- Biased  Composite  Grab  Environmental  Grid   
 Intrusive  Non-Intrusive  Phased  Source  Random

\* Systematic random samples, selected one per cell and meeting the minimum distance criterion

7B. Sample Work Plan Reference: Project Specific Plan for the associated Remediation area Remedial Action Work Plan

Background samples: OU5 RI

7C. Sample Collection Reference: Associated PSP(s), SMPL-01

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8. Quality Control Samples: (Put an X in the appropriate selection.)

8A. Field Quality Control Samples:

Trip Blanks	<input checked="" type="checkbox"/> <sup>1</sup>	Container Blanks	<input checked="" type="checkbox"/>
Field Blanks	<input checked="" type="checkbox"/> <sup>2</sup>	Duplicate Samples	<input checked="" type="checkbox"/>
Equipment Rinse Blanks	<input checked="" type="checkbox"/>	Split Samples	<input checked="" type="checkbox"/> <sup>3</sup>
Preservative Blanks	<input type="checkbox"/>	Performance Evaluation Samples	<input type="checkbox"/>

Other (specify) \_\_\_\_\_

1) Collected for volatile organic sampling

2) As noted in the PSP

3) Split samples will be taken where required by the EPA

8B. Laboratory Quality Control Samples:

Method Blank	<input checked="" type="checkbox"/>	Matrix Duplicate/Replicate	<input checked="" type="checkbox"/>
Matrix Spike	<input checked="" type="checkbox"/>	Surrogate Spikes	<input checked="" type="checkbox"/>
Tracer Spike	<input checked="" type="checkbox"/>	Other (specify) _____	

---

9. Other: Please identify any other germane information that may impact the data quality or gathering of this particular objective, task, or data use.

Sample density will be dependent upon the CU size (Group 1 [250'x250'] or Group 2 [500'x500']), as determined by historical and pre-certification scan data.

2847

**APPENDIX B**

**A2PIII PART TWO CU  
SAMPLES/COORDINATES/IDENTIFICATION**

000035

**APPENDIX B  
AREA 2 PHASE III PART TWO CERTIFICATION SAMPLES**

2847

<b>CERTIFICATION UNIT</b>	<b>SAMPLE ID</b>	<b>ANALYSIS</b>	<b>NORTHING</b>	<b>EASTING</b>
A2P3-PT2-C-1	A2P3-PT2-C-1-01	ARCHIVE	478427	1349141
A2P3-PT2-C-1	A2P3-PT2-C-1-02	TAL A	478482	1349158
A2P3-PT2-C-1	A2P3-PT2-C-1-03	TAL A	478484	1349214
A2P3-PT2-C-1	A2P3-PT2-C-1-04	TAL A	478462	1349273
A2P3-PT2-C-1	A2P3-PT2-C-1-05	TAL A	478494	1349319
A2P3-PT2-C-1	A2P3-PT2-C-1-05-D	TAL A	478494	1349319
A2P3-PT2-C-1	A2P3-PT2-C-1-06	TAL A	478438	1349427
A2P3-PT2-C-1	A2P3-PT2-C-1-07	ARCHIVE	478475	1349483
A2P3-PT2-C-1	A2P3-PT2-C-1-08	TAL A	478446	1349550
A2P3-PT2-C-1	A2P3-PT2-C-1-09	TAL A	478389	1349423
A2P3-PT2-C-1	A2P3-PT2-C-1-10	TAL A	478363	1349465
A2P3-PT2-C-1	A2P3-PT2-C-1-11	ARCHIVE	478393	1349499
A2P3-PT2-C-1	A2P3-PT2-C-1-12	TAL A	478402	1349557
A2P3-PT2-C-1	A2P3-PT2-C-1-13	TAL A	478268	1349416
A2P3-PT2-C-1	A2P3-PT2-C-1-14	ARCHIVE	478321	1349447
A2P3-PT2-C-1	A2P3-PT2-C-1-15	TAL A	478300	1349502
A2P3-PT2-C-1	A2P3-PT2-C-1-16	TAL A	478308	1349550
A2P3-PT2-C-2	A2P3-PT2-C-2-01	TAL A	478271	1349214
A2P3-PT2-C-2	A2P3-PT2-C-2-02	ARCHIVE	478232	1349275
A2P3-PT2-C-2	A2P3-PT2-C-2-03	TAL A	478315	1349198
A2P3-PT2-C-2	A2P3-PT2-C-2-04	TAL A	478316	1349242
A2P3-PT2-C-2	A2P3-PT2-C-2-05	TAL A	478239	1349338
A2P3-PT2-C-2	A2P3-PT2-C-2-06	TAL A	478289	1349344
A2P3-PT2-C-2	A2P3-PT2-C-2-07	ARCHIVE	478327	1349316
A2P3-PT2-C-2	A2P3-PT2-C-2-08	TAL A	478348	1349372
A2P3-PT2-C-2	A2P3-PT2-C-2-09	TAL A	478357	1349164
A2P3-PT2-C-2	A2P3-PT2-C-2-10	ARCHIVE	478387	1349245
A2P3-PT2-C-2	A2P3-PT2-C-2-11	TAL A	478420	1349202
A2P3-PT2-C-2	A2P3-PT2-C-2-12	TAL A	478433	1349283
A2P3-PT2-C-2	A2P3-PT2-C-2-13	ARCHIVE	478404	1349319
A2P3-PT2-C-2	A2P3-PT2-C-2-14	TAL A	478412	1349382
A2P3-PT2-C-2	A2P3-PT2-C-2-15	TAL A	478441	1349344
A2P3-PT2-C-2	A2P3-PT2-C-2-16	TAL A	478472	1349391
A2P3-PT2-C-2	A2P3-PT2-C-2-16-D	TAL A	478472	1349391
A2P3-PT2-C-3	A2P3-PT2-C-3-01	ARCHIVE	477858	1349185
A2P3-PT2-C-3	A2P3-PT2-C-3-02	TAL A	477909	1349229
A2P3-PT2-C-3	A2P3-PT2-C-3-03	TAL A	477947	1349156
A2P3-PT2-C-3	A2P3-PT2-C-3-04	TAL A	478048	1349159
A2P3-PT2-C-3	A2P3-PT2-C-3-05	TAL A	478043	1349293
A2P3-PT2-C-3	A2P3-PT2-C-3-06	TAL A	478076	1349234
A2P3-PT2-C-3	A2P3-PT2-C-3-07	ARCHIVE	478146	1349255
A2P3-PT2-C-3	A2P3-PT2-C-3-08	TAL A	478154	1349323
A2P3-PT2-C-3	A2P3-PT2-C-3-08-D	TAL A	478154	1349323
A2P3-PT2-C-3	A2P3-PT2-C-3-09	TAL A	478064	1349108
A2P3-PT2-C-3	A2P3-PT2-C-3-10	TAL A	478174	1349050
A2P3-PT2-C-3	A2P3-PT2-C-3-11	ARCHIVE	478189	1349128
A2P3-PT2-C-3	A2P3-PT2-C-3-12	TAL A	478192	1349187
A2P3-PT2-C-3	A2P3-PT2-C-3-13	ARCHIVE	478247	1349036
A2P3-PT2-C-3	A2P3-PT2-C-3-14	TAL A	478269	1349135
A2P3-PT2-C-3	A2P3-PT2-C-3-15	TAL A	478349	1349060
A2P3-PT2-C-3	A2P3-PT2-C-3-16	TAL A	478378	1349102