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COMMENTS: DRAFT PPSP SOILS CERTIFICATION

01/07/97

OEPA DOE-FEMP
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COMMENTS



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

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~~K-0764~~
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George V. Voinovich
Governor

January 7, 1997

RE: DOE FEMP
MSL 531-0297
HAMILTON COUNTY
COMMENTS: DRAFT PPSP
SOILS CERTIFICATION

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Please find as an attachment the Ohio EPA and Ohio Department of Health, Bureau of Radiation Protection comments on Area 1, Phase 1 Procedures and Project Specific Plans for Precertification and Certification for Operable Unit 5 Soils, Rev. B. The completed version of this submittal was received on November 18, 1996.

Because the soil certification process as described in the Remedial Action Work Plan for the Soil Remediation Project, Area 1, Phase 1 is so dependent on the real-time gamma spectroscopy methods that are described here, Ohio EPA suggests that DOE consider deferring the submittal of a revised version of this document until the regulatory agencies have commented on the latest version of the RAWP. We suggest that the procedures be submitted as an attachment to the RAWP.

If you have any questions, please contact Tom Ontko or me.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FERMCO
Ruth Vandergrift, ODH
Mike Proffitt, DD&GW
Sharon McLellan, PRC
Manager, TPSS/DERR,CO
Dave Ward, GeoTrans
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Ohio Environmental Protection Agency comments on
Area 1, Phase 1 Procedures and Project Specific Plans for Precertification and Certification
for Operable Unit 5 Soils, Revision B

General Comments

- 1) Commenting Organization: Ohio EPA Commentor: ODH
Section #: Pg #: Line #: Code:
Original Comment #:
Comment: Splitting samples from each CU between the FEMP and offsite labs would add an extra level of accuracy and provide a precision comparison. This is warranted in that costs associated with removal of insufficient or excess soils due to use of erroneous WAC data would adversely impact the site's overall cleanup budget.

- 2) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code: C
Original Comment #:
Comment: Provide procedures for Bromopadap analytical methods.

- 3) Commenting Organization: Ohio EPA Commentor: ODH
Section #: Pg #: Line #: Code:
Original Comment #:
Comment: At selected areas in either the precertification or certification stage, a coarse walkover with a Micro R meter would provide a simple low cost quality control check. ODH is available to collaborate with FEMP staff in providing such surveys.

- 4) Commenting Organization: Ohio EPA Commentor: ODH
Section #: Pg #: Line #: Code:
Original Comment #:
Comment: Are there any contingencies to involve other parties in providing the "independent" assessments and surveillances of work processes/operations other than the FEMP QA organization?

Specific Comments:

- 5) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.1 Pg #: 1 Line #: Para 3 Code: C
Original Comment #:
Comment: One of the purposes of A1P1 Comparability Study in addition to meeting the "sensitivity and precision requirements of the site", should be to also meet regulator and stakeholder requirements/concerns.

Ohio EPA comments
 Procedures and PSPs Soil Certification, Rev B
 Page 2

- 6) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 1.2 Pg #: 1 Line #: Para 3 Code: C
 Original Comment #:
 Comment: The use of an off-site laboratory for a small percentage of the precertification samples may be warranted to ensure the results from the on-site laboratory are not biased.
- 7) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: 1.2.3 Certification Pg. #: 3 of 14 Line # Code: C
 Original Comment #
 Comment: In this section, it states that certification sampling will be performed when precertification sampling and historical data indicates FRLs have been meet. Have the areas with historical data indicating no exceedences of FRLS been identified? Please include a map where it is proposed to certify without doing precertification work.
- 8) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 1.2.1 Pg #: 3 Line #: n/a Code: C
 Original Comment #:
 Comment: This section states that one physical sample per CU, biased on the highest NaI measurement, will be collected to confirm detector system measurements. How will these data be compared and what criteria will be used to demonstrate that the detector system measurement and the physical sample compare favorably?
- 9) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 1.2.3 Pg #: 3 Line #: Para 1 Code: C
 Original Comment #:
 Comment: What criteria is used to determine that 12 random samples per CU for primary COCs will be an adequate number of samples within the physical boundary of the CU? Will the number of samples increase to clearly demonstrate that the appropriate confidence levels are achieved.
- 10) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 1.2.4 Pg #: 3 Line #: Para 1 Code: C
 Original Comment #:
 Comment: In addition to meeting the "sensitivity and precision requirements of the site", A1P1 Comparability Study should also meet regulator and stakeholder requirements/concerns.
- 11) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: Certification Sampling, 2.0 Pg. #: 5 Line #: 15 Code: C
 Comment: Analytical soil sampling procedures are provided for (1) precertification sampling,

Ohio EPA comments
 Procedures and PSPs Soil Certification, Rev B
 Page 3

(2) WAC attainment sampling, (3) certification sampling, and (4) Comparability Study Part B sampling. Please provide the rationale for the differing analytical sample collection protocols specified for these activities. For example, 4" sample tubes are specified for certification and precertification sampling. Sample lengths of 6" and 0 - 4", however, are indicated for WAC attainment sampling and for Comparability Study Part B sampling, respectively. Additionally, the protocols are inconsistent with respect to the treatment of surface vegetation. All surface vegetation is to be removed prior to certification and precertification sampling. Samples collected for WAC attainment assessment and Comparability Study Part B, however, are strictly required to include surface vegetation. Please include a discussion of the rationale for treating surface vegetation differently in the various situations.

- 12) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Table 2-2 Pg #: 6 Line #: n/a Code: C
 Original Comment #:
 Comment: Why are there no methods listed for aluminum, arsenic, and beryllium?
- 13) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 7.0 Pg #: 7 Line #: Para 2 Code: C
 Original Comment #:
 Comment: For this equation to apply, it is Ohio EPAs understanding that n should be greater than 20. Please provide a reasons why fewer samples are justified in this case.
- 14) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: 2.3, Certification Sampling Pg. #: 8 Line #: 28 Code: E
 Comment: This sentence is confusing. It should be clarified to read as follows. "Using a random number generator, 12 subunits for primary COCs and 9 subunits for secondary COCs will be selected along with the appropriate easting/northing coordinates within each subunit for each specific sample collection location."
- 15) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: 2.3, Certification Sampling Pg. #: 8 Line #: 34 Code: E
 Comment: The sentence that reads "One randomly located archive samples...." Should be changed to read "One randomly located archive sample..."
- 16) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: 2.3, Certification Sampling Pg. #: 8 Line #: na Code: E
 Comment: In Table 2-4, the entry in the column entitled "LAB" should be revised to read "Off-Site" for consistency with the text.

Ohio EPA comments
 Procedures and PSPs Soil Certification, Rev B
 Page 4

- 17) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.2.2 Pg #: 8 Line #: Para 2 Code: C
 Original Comment #:
 Comment: What precautions will be used to ensure that the sample location is not "lost" between the time the stake is placed and geodimeter coordinates are taken? Stakes can be inadvertently moved, broken, etc.
- 18) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.3 Pg #: 8 Line #: Para 3 Code: C
 Original Comment #:
 Comment: What criteria would necessitate "resampling" of a CU?
- 19) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Table 2-4 Pg #: 8 Line #: n/a Code: C
 Original Comment #:
 Comment: The text for Certification Physical Sampling states that "all samples for certification sampling" will be sent off-site for analysis; the table states "on-site".
- 20) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: Certification Sampling, 2.0 Pg. #: 9 Line #: 1 Code: C
 Comment: Certification sampling for secondary COCs including radiological constituents, metals, and PCBs is discussed, but no mention is made regarding PAHs. The text and Table 2-6 should be revised to consider the six PAHs presented in Section 5 of the *Remedial Action Work Plan for the Soil Remediation Project for Area 1 Phase I* (July 1996).
- 21) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.3 Pg #: 9 Line #: Para 5 Code: C
 Original Comment #:
 Comment: 1 per 20 sample duplicate ratio does not yield a duplicate per CU. We recommend at least one duplicate per CU. The procedure for obtaining a field duplicate immediately adjacent to the sample point does not provide laboratory QA/QC. It will merely provide a measure of the variability in the soil matrix. A duplicate sample for the laboratory should be a sample which is "split".
- 22) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: Certification Sampling, 2.0 Pg. #: 9 Line #: Table 2-6 Code: E
 Comment: The analyte Arochlor 1269 should be revised to read Arochlor 1260.
- 23) Commenting Organization: Ohio EPA Commentor: OFFO

Ohio EPA comments
 Procedures and PSPs Soil Certification, Rev B
 Page 5

Section #: 2.4.1 Pg #: 10 Line #: Para 2 Code: C

Original Comment #:

Comment: Place a \pm on the 15 minute count time. It is unclear whether approximately means 14 min. 56 sec., or 12 min.

- 24) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: 2.3 Certification Physical Sampling Pg. #: 10 of 14 Line # Code: C
 Original Comment #
 Comment: The first paragraph of this page discusses obtaining sampling coordinates by Geodimeter survey instrument or a GPS. Will a GPS have sufficient accuracy to relocate a sample location if necessary? What is the accuracy of GPS?
- 25) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.4.2 Pg #: 11 Line #: Para 1 Code: C
 Original Comment #:
 Comment: At what time will soil moisture measurements be made relative to the sampling event? Will adding soil to the area to obtain a flat surface affect the "true" measurement and if soil is added to the area, will this event be recorded in the field activity log?
- 26) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: 2.5.2 Radiological Analysis Pg. #: 12 of 14 Line # Code: C
 Original Comment #
 Comment: This section describes the sample preparation for radiological analyses. We suggest specifying a riffle splitter for mixing and obtaining an aliquot of each sample.
- 27) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: 3.3, Certification Sampling Pg. #: 13 Line #: 30 Code: E
 Comment This sentence should be corrected to read as follows: "The duplicate samples shall be collected at the rate of 1 for every 20 samples collected for each analytical group."
- 28) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: Certification Sampling, Appendix A, SL-023 Pg. #:8 Line #: 13 Code: C
 Comment: The following text should be added to the list of defined variables:
- $Z_{1-\alpha}, Z_{1-\beta} =$ the critical values for the normal distribution with probabilities $1 - \alpha$ and $1 - \beta$.
- 29) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: SL-023 Pg #: n/a Line #: n/a Code: General

Ohio EPA comments
Procedures and PSPs Soil Certification, Rev B
Page 6

Original Comment #:

Comment: Please provide justification for using ASL-B. The potential benefits from using real-time methods are large enough and the potential consequences of making the wrong decision are great enough that the additional costs incurred by up-grading to ASL-C could be justified.

- 30) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: Certification Sampling, App. A, SL-023 Pg. #:7 Line #: 11 Code: C
 Comment: The formula presented in the referenced text should be revised so that the denominator reads as the square root of the sample variance divided by n (the number of samples) rather than n-1 as is shown. The revised formula should, therefore, read as follows:

$$t = \frac{FRL - \bar{x}}{\sqrt{\frac{S^2_i}{n}}}$$

where:

- FRL = remedial goal
- \bar{x}_i = mean of the i^{th} CU
- S^2_i = sample variance of the i^{th} CU
- n = number of samples from the i^{th} CU.

Please see equation 6.8 in "Methods for Evaluating the Attainment of Cleanup Standards, Volume 1" and also USEPA Original Specific Comment # 9 in the first DOE Response to Comments on the draft Area 1, Phase 1 RAWP.

- 31) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: Certification Sampling, App. A, SL-023 Pg. #: 7 Line #: 17 Code: C
 Comment: This sentence should be revised to read "If the computed value (t) exceeds the critical value of a t-distribution for alpha = 0.05 at **n-1 degrees of freedom**, then the null hypothesis is rejected and the CU is certified as having average ASCOC concentrations below the applicable FRL."

- 32) Commenting Organization: OEPA Commentor: GeoTrans, Inc.

Ohio EPA comments
 Procedures and PSPs Soil Certification, Rev B
 Page 7

Section #: App. A, SL-023 Pg. #: 14 Line #: Table C.1-1 Code: C
 Comment: Based on Section 5 of the *Remedial Action Work Plan for the Soil Remediation Project for Area 1 Phase I* (July 1996), lead, manganese, benzo(a)anthracene, benzo(a)pyrene, benzo(a)fluoranthene, benzo(g,h,i)perlyene, dibenzo(a,h)anthracene, and indeno(1,2,3-cd)pyrene are also COCs in Area 1, Phase I. Table C.1-1 should be revised to include information for these constituents.

- 33) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: Certification Sampling, App. A, SL-023 Pg. #:16 Table C.1-3 Code: C
 Comment: Table C.1-3 summarizes the computations used to estimate the number of samples per CU in Area 1 Phase 1 that are needed to achieve acceptable confidence levels. Based on Section 5 of the *Remedial Action Work Plan for the Soil Remediation Project for Area 1 Phase I* (July 1996), aluminum, manganese, and molybdenum are also COCs in Area 1, Phase I. Table C.1-3 should be revised to include information for these constituents. Additionally, sample numbers computed using the data in the table are not consistent with the sample numbers shown. Please clarify these calculations.

APPENDIX A, DQO# SL-024

- 34) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 4.0 Pg #: 6 Line #: Temporal Boundaries Code: C
 Original Comment #:
 Comment: In the section labeled practical considerations saturated soils and amount of precipitation should be clearly defined.
- 35) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: Certification Sampling, App. A, SL-024 Pg. #: 6 Line #: 18 Code: C
 Comment: The text states that homogeneous CUs will not exceed 15 acres. The portion of Area 1 Phase 1 that is proposed for certification using homogeneous CUs is shown on the certification plans (Appendix B) for primary COCs (Figure 7-1) and for secondary COCs (metals) (Figures 7-3). As has been done for individual Class I and Class II CUs, the proposed boundaries for the individual 15 acre homogeneous CUs should be shown on the certification plans.
- 36) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: Certification Sampling, Appendix B Pg. #: Line #: Code: C
 Comment: Based on Section 5 of the *Remedial Action Work Plan for the Soil Remediation Project for Areal Phase I* (July 1996) the PAHs benzo(a)anthracene, benzo(a)pyrene, benzo(a)fluoranthene, benzo(g,h,i)perlyene, dibenzo(a,h)anthracene, and indeno(1,2,3-cd)pyrene are also COCs in Area 1, Phase I. A figure showing CUs for PAH certification sampling should

Ohio EPA comments
 Procedures and PSPs Soil Certification, Rev B
 Page 8

also be included in Appendix B.

**PSP FOR A1P1 RAWP COMPARABILITY STUDY, PART B
 PROJECT NUMBER 50.03.40.03**

- 37) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 1.2 Pg #: 2 Line #: Para 1 Code: C
 Original Comment #:
 Comment: Daily ambient humidity should also be recorded, as it may also lead to possible interference.
- 38) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.1 Pg #: 4 Line #: n/a Code: C
 Original Comment #:
 Comment: What types of circumstances/criteria would necessitate the need to take repeat measurements. These types of criteria need to be clearly identified and incorporated into certification sampling, if successful.
- 39) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.3 Pg #: 5 Line #: n/a Code: C
 Original Comment #:
 Comment: Ambient humidity measurements should also be recorded for day that sampling activities are in process.
- 40) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.4.2 Pg #: 6 Line #: Para 2 Code: C
 Original Comment #:
 Comment: What types of conditions would prompt the lead to change these dimensions? Consistency in this study is imperative. If these parameters will not change during certification sampling, they should not change during the comparability study.

APPENDIX A, DQO# SL-025

- 41) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: Certification Sampling, DQO SL-025 Pg. #: 2 Line #: 14 Code: C
 Comment: The stated goal of the Part B Comparability Study is to "determine if certification decisions at the Certification Unit (CU) level can be made that meet the sensitivity and precision requirements of the site." The study as currently designed provides an effective means for direct comparison of the in-situ methods with conventional laboratory results under a given set of field

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Ohio EPA comments
 Procedures and PSPs Soil Certification, Rev B
 Page 9

conditions. The study should, however, assess the comparability of in-situ methods with analytical methods under conditions that include the anticipated extremes in soil moisture and temperature that will likely be encountered during data collection. A key result of the study should be to determine the "window" of applicability of these methods with regard to soil moisture and temperature in order to avoid their application when ambient conditions are unsuitable for accurate data collection. Alternatively, results from previous studies of these devices should be provided documenting the range of soil moisture and temperature conditions required for effective use.

- 42) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.0 Pg #: 3 Line #: n/a Code: C
 Original Comment #:
 Comment: Add ambient humidity to the bullet listing environmental conditions.
- 43) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 7.2 Pg #: 6 Line #: n/a Code: C
 Original Comment #:
 Comment: The use of ASL D should be strongly considered, since the end result of this study is to demonstrate certification sampling can be performed with in-situ gamma measurement instruments.

**PSP FOR A1P1 RAWP PRECERTIFICATION SOIL SAMPLING PLAN
 PROJECT NUMBER 50.03.40.02
 APPENDIX A, DQO# SL-024**

- 44) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.0 Pg #: 4 of 17 Line #: n/a Code: C
 Original Comment #:
 Comment: Possible Results, Item 5: Without a completed comparability study it is uncertain that the RTRACK can detect uranium levels at 75% of the FRL, although it should be able to determine areas which exceed the WAC.
- 45) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 7.0 Pg #: 9 of 17 Line #: n/a Code: C
 Original Comment #:
 Comment: Which detection system, RTRACK or HPGe, will be used to identify areas for excavation?

PROCEDURE NO: EQT-30

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Ohio EPA comments
 Procedures and PSPs Soil Certification, Rev B
 Page 10

OPERATION OF SODIUM IODIDE SYSTEM

- 46) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: n/a Line #: n/a Code: C
 Original Comment #:
 Comment: Provide figures to the procedure to clearly identify the placement of the thorium source with respect to the detector housing, as well as a schematic of the overall system to aid in understanding the purpose of this procedure.
- 47) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: n/a Line #: n/a Code: C
 Original Comment #:
 Comment: Calibration of radiation detection equipment is typically conducted in a low ambient radiation area. This procedure appears to be more consistent with a system (source) check procedure than a calibration procedure.
- 48) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: n/a Line #: n/a Code: C
 Original Comment #:
 Comment: The expected gamma energies for the thorium mantle source are not given. Does the thorium mantle adequately cover the expected span of energies for detection? Why not use a natural uranium source to calibrate the instrument? The use of a "calibration pads" as used in the USID study should be considered as an alternative method for the calibration of this detector.
- 49) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: n/a Line #: n/a Code: C
 Original Comment #:
 Comment: At what frequency is this "calibration" to take place?
- 50) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
 Section #: Certification Sampling, EQT-30 Pg. #: 9 Line #: 21 Code: C
 Comment: It was indicated in the response to Comment 38 provided in the *DOE Response Document for the U.S. EPA Technical Review Comments on the "Draft Operable Unit 5, Area 1, Phase I Remedial Action Work Plan"* that the accuracy of Global Positioning System (GPS) is monitored regularly during data collection. Specifically, it is stated that "the GPS is checked throughout the day as per the R-TRAK procedure which evaluates how close known survey points are to the position data the GPS on the R-TRAK has reported. These measurements must be within specified tolerances (see R-TRAK operating procedures)." Please consider revising EQT-30 to include procedures for verifying GPS accuracy.

Ohio EPA comments
Procedures and PSPs Soil Certification, Rev B
Page 11

- 51) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: Certification Sampling, EQT-30 Pg. #: 10 Line #: 3 Code: C
Comment: The text states that energy calibration checks (Section 6.4) will be performed prior to every run. Please consider revising the procedure to specify energy calibration checks also at the beginning and end of each day of data collection. In addition, Section 3.0 (Definitions) indicates that the Sodium Iodide (NaI) Detection System includes the ADCAM Series Multi-Channel Analyzer (ADCAM). Procedure No. EQT-23 describes pre- and post-operational checks (Sections 6.4 and 6.6, respectively) that will be performed for the ADCAM. EQT-30 should be revised to reference the ADCAM checks where appropriate.

- 52) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: Comparability Study, 1.1 Pg. #: 1 Line #: 43 Code: C
Comment: This sentence does not make sense. It should probably be corrected to read: "Record field *instrument* variables such as counting time and detector height *and* environmental variables such as moisture levels, soil density, vegetation, and contamination distributions.

- 53) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: Comparability Study, 1.2 Pg. #: 2 Line #:18 Code: E
Comment Remove the "(" at the end of the sentence.

- 54) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: Comparability Study, 2.4.2 Pg. #:7 Line #: Table 2-2. Code: C
Comment: The lab designation of "On/Off-Site" for each analyte is insufficient. The table should specify which analytes will be analyzed at the on-site lab and which will be analyzed at the off-site lab.
The text states that "physical samples shall be collected and submitted for on-site/off-site laboratory analysis." The text should be clarified to indicate whether both onsite and offsite analyses will be performed or onsite or offsite analyses will be performed.

- 55) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: Comparability Study, 6.0 Pg. #: 10 Line #: 48 Code: C
Comment: This sentence should be revised to read as follows: "Following completion of sampling, *the contact wastes shall be placed* into properly labeled bags *and* disposed of in accordance with *the* appropriate FEMP waste management policies.

- 56) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: Comparability Study, 7.0 Pg. #: 11 Line #: 18 Code: C
Comment: Change "Graphical Information System" to "Geographic Information System".

Ohio EPA comments
Procedures and PSPs Soil Certification, Rev B
Page 12

- 57) Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: Comparability Study, 6.0 Pg. #: 5 Line #: 25 Code: C
Comment: This sentence should be revised to read as follows: "Following completion of sampling, *the contact wastes shall be placed* into properly labeled bags *and* disposed of in accordance with *the* appropriate FEMP waste management policies.