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| Section 1.1 – Delete last paragraph, or revise just to address the applicability of the SAP to the RI/FS and the CRA. OCC does not agree with the statement that the CRA should support any particular recommendation at this time. Also see Section 3.1, which has a concise description of the uses of the data consistent with the CERCL/RCRA process. | The sentence that stated that the CRA would support the no-action CAD/ROD has been deleted. |
| Section 1.3 – I like the idea of the Annual IASAPP Addenda. But, SAP needs statement that if consensus on the annual IASAP is not reached by October 1 (or such other date that K-H believes is necessary to support annual work planning and execution) of each year, then DOE may invoke dispute resolution pursuant to RFCA Subpart F, "Disputes Regarding Overall Direction of Proposed Work". | Sections 1.2 and 1.3 have been revised to reflect discussions with the agencies. |
| Section 2.3 – It's not until you get to Section 2.3.7, page 18 PCB Removal discussion, that the 1991 IAG is referenced. This reference should be at the beginning of this section because most of the work described was done pursuant to that IAG. This also helps put the RFCA OU consolidation in context. | Text, that references the IAG, has been added to the beginning of Section 2.3. |
| Section 3.1.1, *Inputs to the Decisions* – Item 4 (f) needs to be changed to include determining spatial extent of soils <u>above Tier II</u>. RFCA ALF requires that contamination above Tier II must be evaluated to determine if an action is necessary to protect surface water or ecological resources and what management actions to preclude unacceptable exposure must be taken. The fourth bullet on page 22 also needs to also include greater than Tier II "hot spots". | The text in Section 3.1.1 has been clarified and figures have been added.<br><br>The text in the fourth bullet is from the IAG. |
| Section 3.1.1 and 3.1.3 – There doesn't seem to be appropriate attention to data needs, inputs, etc. for groundwater or surface water. Many of the IHSS/PAC/UBC are likely to have contaminated water issues that need to | The IASAP is specific to surface and subsurface soil and is focused on characterizing soil that requires remediation. Eventual groundwater remediation will be conducted on a Site- |

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| be discussed fully (see, e.g., section 4.4, 4th and 5th bullets). The logic and rationale for deferring to "other SAPs" for water data must be better documented and justified. Certainly, issues like partitioning of contaminants between water and soil is an issue (e.g., is sediment to be sampled, and what does one do with water that may separate from the soil portion when it reaches the lab?), as is the extent of any plumes in relation to locating likely sources of soil contamination that may result in water contamination. See also comment 4 above in relation to soils above Tier II. The mere statement in 3.1.3 does not provide any comfort that the Draft IA SAP approach to bifurcating soils and water is technically correct or legally defensible to meet the stated objectives. This is especially true if the exposure units are to be developed for the comprehensive risk assessment methodology that is proposed as part of this SAP. (I have not yet critically read the CRA, SAP Appendix C, so this comment may change after review of the proposed CRA). Also, aren't we missing an opportunity in this SAP to address all relevant media? Why don't we just do it all in one document and not have to draft more SAP's? | wide, not IHSS, PAC, or UBC site basis. |
| Section 4.1 – On page 35, it states that an off-site laboratory will be used. Why limit to off-site? I recommend deleting. | The text has been modified to state that offsite and onsite laboratories may be used. |
| Table 5 – Too many insignificant decimal places. Shouldn't the grid interval be in feet, not square feet? The asterisk is confusing in A*л, since it also connotes a footnote for SF. I assume this means A x л? | All numbers were changed to 2 significant figures.<br>The grid interval is correct.<br>The * has been deleted. |
| Section 4.81 through 4.8.5 – Consistent with comment 5, other liquids may be encountered in or around these drain systems. The SAP should address what the sampling strategy will be for encountered liquids. | A new section – Section 4.11 has been added to address incidental water and groundwater sampling. |
| Section 9.0 – First paragraph seems too generic. Doesn't the site have an | The text has been changed to state that RFETS follows OSHA |

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| H&S procedure covering this type of work? This should be referenced (i.e., in the Reference Section), rather than "necessary H&S protocols,", whatever they are. Note that OSHA is not applicable at RFETS, but we follow the standards pursuant to DOE Order 440.1A. | rather than OSHA requirements are applicable to RFETS. |