REVIEW AND COMMENT RECORD			1. Page 1 of 3 2. Date: April 20, 1993
3. Document No./Title:	Technical Memorandum No. 4, Surface Soil Sampling Plan for the Ash Pits Area: Operable Unit 5 March, 1993		
Reviewer's Name:	Agency: Colorado Department of Health		Date: April 9, 1993
Item	**Comment(s)**	**Disposition**	**Status**
1. SPECIFIC COMMENT	Section 3.1: DOE needs to clarify why no biased sample is planned downwind from the suspected ash pile area. If this was an ash pile, it seems that wind dispersion of the piled material is more likely than dispersion downwind of material from the ash pits. A sample here seems reasonable.	Page 21, second paragraph of the final version of Technical Memorandum 4 (TM4) explains that "No sample was positioned downwind of the suspected ash pile area located to the east of IHSS 133.1 because field reconnaissance indicates that the material disposed of at this location is actually concrete." This conclusion is supported earlier, on page 4 of both the draft and final versions of TM4.	Comment accepted, clarification provided.

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2. SPECIFIC COMMENT	Section 3.1: The Division believes that the biased samples being collected downwind from the pits should be located on HPGe grid nodes in a manner similar to the random samples.	Page 22, second paragraph of the final version of TM4 explains that "The 100 percent HPGe survey currently being conducted will provide radionuclide activities which may be compared with the laboratory results from the biased samples collected downwind of each IHSS." The biased samples have not been relocated to correspond to HPGe grid nodes. Bias towards finding contamination is introduced by locating samples immediately downwind of each IHSS. Moving the biased samples an additional 50 to 85 feet away in order to match a HPGe grid node could reduce the probability of finding contamination, and effectively remove the bias. A preferred solution seems to be to let the 100 percent HPGe coverage provide data for comparison with the biased sampling locations already proposed.	Comment acknowledged and effectively accepted

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3. SPECIFIC COMMENT	Section 3.2: More information on the sample collection method is necessary than what is currently included in this section. How will the Rocky Flats Plant method be employed; will compositing techniques be used; if so, how? Consistency with previously approved surface soil sampling methodologies in this and other OUs should be achieved (TM5 for OU1, TM 10 for OU5).	Page 22, fourth paragraph of the final version of TM4 states " Profile samples will be collected in accordance with EG&G Operating Procedure GT.8 Document Change Number 5-21000-OPS-GT.8-92.R2-93.02. Surface profiling obtains discrete soil samples from depths up to six inches. Each discrete sample represents soil from an interval of two inches in depth, for example, from the ground surface to two inches deep, from two to four inches deep and from four to six inches deep. Profile samples will be collected from the ground surface downward in two inch increments as described above using a stainless steel trowel. Sufficient material will be collected to fill a 500 milliliter container for laboratory analysis of the radioanalytes listed in Table 1."	Comment accepted
4. SPECIFIC COMMENT	Section 3.3: Given the fact that an old incinerator is included in this investigation, the Division requests that PAHs be added to the analytical suite.	Sections 1.2, 3.1 and 3.3 and Table 1 and Table 3 have all been revised to include PAHs in the analytical suite.	Comment accepted