

REVIEW COMMENT SET

REVIEW OF: RESPONSES TO U.S. DEPARTMENT OF ENERGY COMMENTS
DRAFT FINAL PHASE I RFI/RI WORK PLAN
FOR OPERABLE UNIT NO. 9

PRELIMINARY NOTE 1: This review was conducted to assess the responsiveness to comments presented by HAZWRAP and DOE to the Draft Final Phase I Work Plan for Operable Unit No. 9. The following coding was employed to reflect responsiveness:

- "Y" = Yes, the comment was covered;
- "N" = No, the comment was not covered;
- "NA" = No longer applicable based on changes not made specifically to address this comment;
- "P" = Partially covered response to comment; and
- "A" = Additional comment resulting from response to original comment or changes made to document that impact its content differently than discussed in original comment set.

All numbering of comments correlate to those contained in the response document and consequently the original comment set. The response document contained three sets of responses. Each set of responses is identified and references to page/section/paragraph refer to the DRAFT FINAL PHASE I RFI/RI WORK PLAN dated 11/1/91.

DRAFT

ADMIN RECORD

0U09-A-000061

RESPONSES TO HAZWRAP COMMENTS
DRAFT FINAL PHASE I ENVIRONMENTAL EVALUATION WORK PLAN
FOR OPERABLE UNIT NO. 9

CRITICAL COMMENTS

1. N Changes to the Work Plan (WP) do not reflect the serious consideration needed for DQOs although time constraints apparently prevented this issue from being adequately addressed. Major modifications are still needed.

GENERAL COMMENTS

1. P The changes to the WP do not completely address this general comment. Time constraints are cited in many of the responses to the specific comments. The changes to the WP do not provide the project scoping and work plan rationale that are needed.
2. N The changes to the WP do not address the concern for inadequate project scoping.
3. N Changes were not made to incorporate this comment. The response that the methodology for impact and risk assessment is adequate for a Phase I study is not accurate. The EEWP does not demonstrate how risk and impacts will be addressed, and how exposure to sources of contamination will be addressed. It does not define remediation criteria and pathways analysis. It does not provide an adequate evaluation of criteria developed methodology nor its uncertainties and how these criteria can be used in impact assessment.
4. N Changes were not made to incorporate this comment although the response shows agreement with the inadequacy of the qualitative/quantitative aspect of the risk assessment. The response states that "this part of the risk assessment is being further developed".
5. P Changes were made to the WP to address this comment. The DQO process is not presented in adequate detail for this WP.
6. Y Changes to the WP were not expected from this comment. The response shows agreement with the comment.

DRAFT

7. N No changes were made to the WP resulting from this comment. The use of reference areas should be quantitatively defined in the WP. The response that the WP "recognizes the difficulty of using reference area comparisons" is not substantiated in the WP.
8. N Changes were not made to incorporate this comment. We understand that the ecological inventory station locations do not have any bearing on the location of the samples for abiotic sampling. We are asking why does the ecological study wait for the results of the abiotic sampling before finalizing the Phase I design?
9. N Changes were not made to incorporate this comment. The response indicated a misunderstanding of the concern. The response indicates that Task 3 field efforts will not be initiated until "sufficient information on habitats and biota present have been collected to plan . . ." Our concern deals with (data on habitats and biota present) data for contaminant levels in environmental media.
10. N Changes were not made to incorporate this comment. The concern is that a complete EE is out of place at the end of Phase I. The IAG identifies Phase II as the time for biotic sampling. There is adequate justification for eliminating or greatly restricting the scope of the EE conducted at the end of Phase I. The issue was not addressed in the response. The response addressed issues with which we are more or less in agreement.
11. P Changes were partially made to incorporate this comment. The thrust of the comment was that the scope of the EE should probably be greatly cut back given the disturbed nature of the OU9 environment. This general comment was incorporated into the methodology, and decision points were identified at which the need and advisability of proceeding to the next stage in the assessment would be determined. We have not examined in detail how this decision methodology is being employed. Verbiage was also included in Section 9.1.1 which indicated that Tasks 1 and 2 were already partially completed. This is true, but not to a great extent.
12. N Changes were not made to incorporate this comment. The response showed general agreement with comment, indicating that the "actual mechanisms for integration (meetings, data exchange) need to be developed". Section 9.1.1 has not been modified to address this comment.

DRAFT

SPECIFIC COMMENTS

1. P Changes to the WP reflect some incorporation of the comment but do not reflect that an objective of the baseline EE should be the "evaluation of potential ecological effects under future conditions".
2. N We disagree with the statement that "Use of information generated by the EE is a broad category that needs to be addressed by DOE." This document should reflect the NCP requirements for ecological criteria. No change to the document resulted from this comment.
3. Y,A Although the comment was incorporated, a change was made to the WP text that refers to the Phase I RFI/RI Work Plan for OU9 having been reviewed during preparation of this Work Plan. The OU 4 Work Plan was the reviewed plan.
4. P Although the comment was accepted. The modification does not sufficiently describe the "role of future use scenarios in these EE assessment activities".
5. N The revised WP does not reflect the need for review and revision of EE objectives.
6. N Revision to the text was made. It does not provide the detail requested in the comment for "weighted best evidence" and does not address a comparison to other approaches commonly used in ecological impact and risk assessment.
7. N The WP text is not changed and no discussion of the role of Phase I abiotic sampling is provided. The response states that the "sampling is planned for Phase I and II to meet these data needs". This should be discussed and rationale provided in the text of this WP.
8. N The WP text is not changed. The response states that the "...comments address activities that will occur during the implementation of the EE". This document provides plans for implementation of the EE. The WP should include all activities to be conducted during implementation.
9. N The response notes the comment and indicates "no response" and that "Conceptual models for pathways connecting OUs have not been developed". This should have been done for the development of this WP.
10. N The response states that "The Task 1 efforts that have been accomplished have been identified in the text." The WP text just states that they were "partially completed"

DRAFT

but does not identify the completed efforts. These efforts should be identified in the WP.

11. Y The decision point at the end of Task 2 is identified in the WP text.
12. P Only the final part of this five part comment was addressed. The four parts that were not addressed leave the WP incomplete. Please see the original comment.
13. N Changes that were made to this paragraph do not relate to this comment. The WP text is not "modified as appropriate" as stated in the response.
14. P Only the fourth part of this five part comment was addressed. The other four parts were not addressed and leave the WP incomplete. Please see the original comment.
15. N Although the response indicates the "comment noted", no changes were made to the WP text. The response indicates that the "pathway model approach and literature search is still to be developed in detail". The discussion of pathway model approach and verification methodology and how "exposure level of dose" can be determined through literature values should be included in the WP.
16. N The response indicates modifications to the WP text. These modifications do not appear to be related to this comment. The comments are noted but are not reflected in the WP as needed.
17. N The response states that this information will be provided during implementation of the EE. This information should be included in the WP. Please see the original comment.
18. N Changes to the WP text are not related to this comment. An adequate response to this comment is not provided. Please see the original comment.
19. N Changes to the WP text do not define "complete data validation". Change just states "data compilation and data validation". These should be defined in the WP.
20. N No changes were made to the WP text. Response to the comment was not relevant. Please see the original comment.
21. N No changes were made to the WP related to the comment. The concerns related in the original comment should be reflected in the WP.

DRAFT

22. N No changes were made to the WP text. The response states that "This information was developed in previous work and was used in the EEWP verbatim". The issues addressed in the comment should be addressed in the WP regardless of the source of information.
23. N No changes were made to the WP text. The response states, the conceptual model was presented Section 2, the information in this section should be discussed in the context of the model.
24. N No changes were made to text due to time frame.
25. N No changes were made to text. The response states that information for mapping OU9 biotic characteristics was unavailable. This OU9 biotic characteristics should be understood and provided in this WP.
26. P Two of the three parts of this comment were incorporated. The use of herbicides is stated to be unknown and to be evaluated. This information should be provided in the WP.
27. N Minor modification was made to text. The response states that the time frame limited incorporation of this comment.
28. N No changes were made to the WP text. The comment is noted. The response states agreement with the comment.
29. N No changes were made to the WP text. The response states that "These taxa have not been completely identified." This should be provided in the WP.
30. N The text was modified, it does not identify the Preble's Meadow Jumping Mouse as being found along Woman Creek.
31. N The changes to the WP text do not reflect the comment.
32. N No changes were made to the WP text. The response states that "These wetlands have not been evaluated or described". This information should be included in the WP.
33. N No changes were made to the WP text. Reduction of uncertainty is stated to be a "general objective of the whole EE process", but the text does not address how the "procedures are intended to reduce the uncertainty". The WP should include this information.

DRAFT

34. N Modifications have been made to the paragraph. The comments were not adequately addressed. The information should be provided in the WP text.
35. N No changes were made to the WP text. The response states that the comment will be "used where appropriate". This is not done.
36. N No changes were made to the WP text. Response states that time and space boundaries "depend on Phase I sampling and site characterization". Nonetheless, this clarification should be included in the WP.
37. P Modification to the text refer to a lack of "historical data base" for development of DQOs. The data gaps should be identified in the context of the conceptual model for development of DQOs.
38. N No changes were made to the WP text due to time frame.
39. This number was skipped in the original comments.
40. N Although the first part of this eight part comment has been incorporated into the WP text, the remaining issues in the comment are not addressed. The response indicates that appropriate modifications were made. This is not the case.
41. N No changes were made to the text although the response indicates that the text was modified as appropriate.
42. N No changes were made to the text. The response refers to the FSP for discussion of "use and need for a reference area".
43. N No changes were made to the text. The response indicates that the text was modified as appropriate.
44. N No changes were made to the text. The response notes that "relationships between food webs and conceptual model are known to the authors" and "will be incorporated into implementation". This information should be provided in the WP.
45. N Changes were made to the text that do not address this comment.
46. N No changes were made to the text. The response states that changes were not made due to the "extensive revision suggested".

DRAFT

47. N No changes were made to the text. The response states that changes were not made due to "extensive revision suggested".
48. N No changes were made to the text. The response indicates otherwise.
49. N No changes were made to the text due to time frame and the extensive revision suggested.
50. N No changes were made to the text due to time frame.
51. N No changes were made to the text due to time frame.
52. N No changes were made to the text due to time frame.
53. N No changes were made to the text due to time frame.
54. N No changes were made to the text. The response states that the COC list "will be modified as sampling data is generated". The preliminary list is of little value.
55. N No changes were made to the text due to time frame.
56. N No change were made to the text. The response states that other sections reflect the potential for not needing reference areas. Clarification is still needed for "insufficient" available information.
57. N No changes were made to the text. The response states that "These decision processes will be tested and modified as necessary during the implementation of the EE". The screening level risk assessment should be reflected in the decision process.
58. N No changes were made to the text. The response states that "sections on DQOs has been modified". These changes do not address the FSP and consistency between tasks.
59. N No changes were made to the text due to time frame.
60. N No changes were made to the text due to time frame.
61. N No changes were made to the text. The comment is agreed with in the response.
62. N No changes were made to the text. The response disagrees with the comment by stating the sampling program provides adequate soil sampling for the ecological

DRAFT

characterization considering the disturbed habitats at the site. Justification for the adequacy of the sampling program should be provided.

63. N No changes were made to the text. The response states that "discussion on this important point not attempted". Review and modification of the Phase I RFI/RI field investigations should be discussed in the WP.
64. N No changes were made to the text. The response states that the justification will be provided in the EE. This justification and support of the lack of concern for biota in the OU9 sediments should be included in the WP.
65. N No changes were made to the text. The response refers to Section 2. The discussion on ground water should be more complete in this section of the WP.
66. N No changes were made to the text due to extensive revisions required.
67. N No changes were made to the text due to time frame.
68. N No changes were made to the text. The response refers to the FSP for the information in the comment. This information should be included in this section of the WP.
69. N No changes were made to the text. The response states that it is "premature to develop this detailed a conceptual model". This information should be available for the WP.
70. N No changes were made to the text. The response refers to the FSP for the information which should be included in this section of the WP.
71. N No changes were made to the text due to time frame.
72. N No changes were made to the text due to time frame. The authors agreed with comment.
73. N No changes were made to the text due to time frame.
74. N No changes were made to the text. The authors agreed to the suggestions.
75. N No changes were made to the text. The response states that Tasks 5 and 2 are "not conducted separately", but that they "may be done concurrently as suggested". This is somewhat confusing although it appears the authors agree with the comment.

DRAFT

76. N No changes were made to the text. The response states agreement with the comment.
77. N No changes were made to the text due to time frame.
78. N No changes were made to the text. The response shows agreement with the comment and indicates no modifications.
79. N No changes were made to the text due to time frame.
80. N No changes were made to the text. The response shows agreement with the comment but does not indicate where the information is provided in the EEWP.
81. N No changes were made to the text. The response states that clarification will be provided. This should be provided in the WP.
82. N No changes were made to the text. The question raised in the comment should be addressed in the WP. Please see the original comment.
83. N No changes were made to the text. The response indicates that modifications were made as appropriate.
84. N No changes were made to the text. The response indicates that modifications were made as appropriate.
85. N No changes were made to the text due to time frame.
86. N The response indicates that an SOP does not exist for soil microbial function. It is stated in the WP that this assessment may be needed. If so, an SOP should be developed.
87. N No changes were made to the text due to time frame.
88. N No changes were made to the text due to time frame.
89. N No changes were made to the text due to time frame.
90. N No changes were made to the text due to time frame.
91. N No changes were made to the text due to time frame.

DRAFT

92. N No changes were made to the text due to time frame and the extensive revisions suggested.
93. N No changes were made to the text. The response shows agreement with the comment and indicates that the text was not modified.
94. N No changes were made to the text due to time frame.
95. N No changes were made to the text. The response shows disagreement with the comment. Please see original comment, the correlating section of the WP, and the response.
96. N No changes were made to the text. The response shows agreement with the comment and indicates that the text was not modified.
97. N No changes were made to the text. The authors agreed with the comment and cited the FSP content as the requirement for the repetitive information of earlier sections.
98. N No changes were made to the text. The authors agreed with the comment and cited the FSP content as the requirement for the repetitive information of earlier sections.
99. N No changes were made to the text. The response shows agreement with the comment and indicates that the text was not modified.
100. N No changes were made to the text. The response shows agreement with the comment and indicates that the text was not modified.
101. N No changes were made to the text. The response shows agreement with the comment and indicates that the text was not modified.
102. N No changes were made to the text. The response shows agreement with the comment and indicates that the text was not modified.
103. N No changes were made to the text. The authors state disagreement that aquatic habitats and taxa are important. This should be indicated and supported in the text of the WP.
104. N No changes were made to the text. The authors disagreed with the comment. Please see the original comment.

DRAFT

105. N No changes were made to the text. The response shows agreement with the comment and indicates that the text was not modified.
106. N No changes were made to the text. The response shows agreement with the comment and indicates that the text was not modified.
107. N No changes were made to the text. The response provided should be included and supported in the WP.
108. N No changes were made to the text. The response indicates disagreement with the comment. Please see the original comment.
109. N No changes were made to the text. The response shows agreement with the comment and indicates that the text was not modified.
110. N No changes were made to the text. The response shows agreement with the comment and indicates that the text was not modified.
111. N No changes were made to the text. The statement "duplicate vs collocated samples has not been decided" should be resolved. This information should be known and reflected in the WP.
112. N No changes were made to the text. The response shows agreement with the comment and indicates that the text was not modified.
113. N No changes were made to the text. The response shows agreement with the comment and indicates that the text was not modified.
114. N No changes were made to the text. The response indicates that the "bullets" referred to in the comment are site characterization parameters.
115. N No changes were made to the text. The authors agree with the comment. The response further states that the pilot study and the initial qualitative studies proposed here are the same. Clarify that statement.
116. N No changes were made to the text. The response indicates that the "decision points have been noted and will become part of the EE implementation. These decision points should be determined and identified in this WP.

DRAFT

RESPONSES TO HAZWRAP COMMENTS
DRAFT FINAL PHASE I WORK PLAN
FOR OPERABLE UNIT NO. 9

GENERAL COMMENTS

1. N No changes were made to the text. Potential pathways and site specific exposure factors should have been determined during the initial screening prior to preparation of the WP.
2. N No changes were made to the text. The response indicates that this EEWP is consistent with other OUs and that the integration of OUs will be done at a later date.
3. N No changes were made to the text. No response is provided to this comment.
4. N No changes were made to the text. The information was assumed to not be available for preparation of the WP. The response states that this information will be evaluated prior to the field investigation.
5. N No changes were made to the text. The response refers to Appendix B for the information.
6. N No changes were made to the text. The response refers to other sections WP where the EE plans are discussed or referenced. The Health and Safety Plan which is to be done by the contractor implementing the RFI/RI is also referred to here.
7. N No changes were made to the text. The response refers to the SOPs for this information.
8. N No changes were made to the text. The response refers to the SOPs for this information.
9. Y To address this comment, an inappropriate line was removed from the text. No information was added. The draft report stated that dermal exposure would be shown to be not quantitatively important.
10. Y Comment is partially incorrect, but the applicable portion has been implemented.

DRAFT

SPECIFIC COMMENTS

1. N No changes were made to the text. The response indicates that the information is consistent with other OUs and acceptable.
2. N No changes were made to the text. The response states that this information is important with respect to understanding the data in Appendix D.
3. N No changes were made to the text. The response indicates that no vegetative species were on the endangered list when the WP was completed and that any new information is to be incorporated as it becomes available.
4. Y The general reference to "a variety of ducks" was deleted.
5. N No changes were made to the text. The response indicates that clarification has been provided.
6. Y Appropriate changes were made to the text.
7. N No changes were made to the text. The response indicates that greater detail is provided in the WP.
8. N No changes were made to the text. The response given is appropriate.
9. N No changes were made to the text. The response indicates that this WP is consistent with other OUs and that the FSPs for various OUs will be integrated in the future.
10. N No changes were made to the text. The response indicates that the reference identified in the text provides the information.
11. Y Appropriate changes were made to the text.
12. Y Appropriate changes were made to the text.
13. Y Appropriate changes were made to the text.
14. N No changes were made to the text. The response shows disagreement with the comment.

DRAFT

16. N No changes were made to the text. The response shows disagreement with the comment.
17. N No changes were made to the text. The response shows disagreement with the comment.
18. Y Appropriate changes were made to the text.
19. N No changes were made to the text. The response appears to be adequate. It should be incorporated into the WP.
20. Y Appropriate changes were made to the text.
21. Y Appropriate changes were made to the text.
22. Y Appropriate changes were made to the text.
23. Y Appropriate changes were made to the text.
24. Y Appropriate changes were made to the text.
25. N No changes were made to the text. The response appears to be adequate. It should be incorporated into the WP.
26. N No changes were made to the text. The response shows valid disagreement with the comment. See comment 25 response.
27. Y Appropriate changes were made to the text.
28. Y Appropriate changes were made to the text.
29. N No changes were made to the text. The response appears to be adequate.
30. N No changes were made to the text. The response states that the changes were made.
31. N No changes were made to the text. The response indicates that data management will be performed by the contractor implementing the WP.
32. Y Changes were made to incorporate this comment.

DRAFT

- 33. Y Appropriate changes were made to the text.
- 34. Y Appropriate changes were made to the text.
- 35. N No changes were made to the text. The response states that a hypothetical plume is given.
- 36. Y Appropriate changes were made to the text.
- 37. N Although the response states that sampling below the water table has been addressed, this was not found in the text.
- 38. N No changes were made to the text. The response shows disagreement with the comment.
- 39. Y Appropriate changes were made to the text.
- 40. N No changes were made to the text. The response indicates that changes were made.

DRAFT

**RESPONSES TO DOE COMMENTS
DRAFT FINAL PHASE I WORK PLAN
FOR OPERABLE UNIT NO. 9**

(Note: These comments were not numbered in the response document. Numbers for comments were generated during this review.)

1. Y Appropriate changes were made to the text.
2. Y This comment was implemented via reference to monthly and annual reports.
3. Y This comment was implemented via reference to monthly and annual reports.
4. N No changes were made to the text. The response indicates changes were incorporated.
5. Y Appropriate changes were made to the text.
6. Y This comment is being implemented through the development of procedures by the EG&G NEPA Group.
7. N No changes were made to the text. The response indicates changes were incorporated.
8. Y Appropriate changes were made to the text.
9. Y Appropriate changes were made to the text.
10. N No changes were made to the text. The response indicates that scoping activities that should have been implemented prior to the development of the WP would be conducted prior to the implementation of the tasks in the WP.
11. Y Appropriate changes were made to the text.
12. Y Appropriate changes were made to the text.
13. Y Appropriate changes were made to the text.
14. Y No changes to the text were required from this comment. The response provides an appropriate answer to the question.

DRAFT

15. P Minor changes were made to the text. The response provides an appropriate answer to the comment. Its content should be included in the WP.
16. N No changes were made to the text. The response indicates that scoping activities that should have been implemented prior to the development of the WP would be conducted prior to the implementation of the RFI/RI.
17. Y Appropriate changes were made to the text.
18. Y Appropriate changes were made to the text.
19. N No changes were made to the text. The response indicates that these drainages are a part of the "OU9 environs" discussed in the text.
20. Y Appropriate changes were made to the text.
21. Y Appropriate changes were made to the text.
22. Y Appropriate changes were made to the text.
23. N No changes were made to the text. The response shows disagreement with the comment.
24. N Minor changes were made to the text. The changes indicate that the 1.5 safety factor is "safe and reasonable", but justification and the origin of the safety factor were not provided.
25. N No changes were made to the text. The response shows disagreement with the comment.
26. N No changes were made to the text. The response indicates that these drainages are a part of the "OU9 environs" discussed in the text.
27. Y Appropriate changes were made to the text.
28. N No changes were made to the text. The response indicates that an attempt was made to determine if hydraulic conductivity data were single values or average values. This information was not found prior to the publication of the WP.
29. Y Appropriate changes were made to the text.

DRAFT

30. N No changes were made to the text. The response shows disagreement with the comment.
31. Y Appropriate changes were made to the text.
32. Y Appropriate changes were made to the text.
33. P Changes were made to the figure to include fugitive dust and sediment. Contrary to the response, the request for highlighting the bedrock/alluvial interface was not done.
34. N No changes were made to the text. The response indicates that EG&G is in the process of assessing ARARs and that the results will be applied to OU9 as appropriate.
35. N No changes were made to the text. The response indicates that this section of the text is a "...standardized discussion which has been developed with input from EPA and CDH..." and that discussions with EG&G indicated that these ARARs may be added to the standard section. They were not added to the text for this version of the WP.
36. Y Appropriate changes were made to the text.
37. N No changes were made to the text. The response indicates that scoping activities that should have been implemented prior to the development of the WP would be conducted prior to the implementation of the RFI/RI.
38. N No changes were made to the text. The response indicates that the Health and Safety Plan will be developed by the contractor conducting the OU9 RFI/RI.
39. N No changes were made to the text. The response indicates that EG&G, CDH, and EPA consider ground water monitoring to be "outside the scope of the Phase I investigation". The response references changes in Section 7.3.1.1 that have been made to clarify sampling procedures when ground water is encountered in a pipeline test pit.
40. N No changes were made to the text. The response refers to Figures 7-3 and 7-6 which identify the test pits and boring locations where surface soil samples will be collected.

DRAFT

41. N No changes were made to the text. The response shows disagreement with the comment and that discussions with drilling contractors and experienced field personnel indicated logistical problems with angled borings.
42. Y Appropriate changes were made to the text.
43. N No changes were made to the text. The response indicates that EG&G, CDH, and EPA consider ground water monitoring to be "outside the scope of the Phase I investigation".
44. N No changes were made to the text. The response indicates that the reference documents that shall be used for calculation of committed effective dose equivalent were added to the text. These references were not found.
45. Y Appropriate changes were made to the text.
46. P Changes to the text included the deletion of uncertainty analysis but the relocation of this discussion to the "general text" was not found.
47. Y Appropriate changes were made to the text.
48. Y Appropriate changes were made to the text.
49. P Appropriate changes were made to Figure 6-1, but changes to the text were not made although the response indicates otherwise.
50. Y Appropriate changes were made to the text.
51. Y Appropriate changes were made to the text.
52. Y Appropriate changes were made to the text.
53. N No changes were made to the text. The response indicates that the surficial soils are included with the "vadose zone soils" and that EG&G, CDH, and EPA consider ground water monitoring to be "outside the scope of the Phase I investigation".
54. Y Appropriate changes were made to the text.
55. Y Appropriate changes were made to the text.
56. Y Appropriate changes were made to the text.

DRAFT

57. Y Appropriate changes were made to the text.
58. Y Appropriate changes were made to the text.
59. N No changes were made to the text. The response indicates that mobile laboratories are not currently planned for OU investigations. However, discussions between EG&G, DOE, and HAZWRAP during meetings conducted November 11-12 indicated that mobile laboratories will be used. The text should be modified to reflect the changes suggested in the comment.
60. P Changes made to the text indicate that these scoping efforts will be conducted prior to the implementation of the WP. However, these activities should have been completed during the development of this WP.
61. N No changes were made to the text. The response shows disagreement with the comment.
62. N No changes were made to the text. The response indicates that the FSP includes references to SOP FO.16, "Field Radiological Measurements" as appropriate to address radiological surveys. The input to the WP requested in the comment was not provided.
63. N No changes were made to the text. The response shows disagreement with the comment.
64. Y Appropriate changes were made to the text.
65. N No changes were made to the text. The response shows disagreement with the comment and that discussions with drilling contractors and experienced field personnel indicated logistical problems with angled borings.
66. N No changes were made to the text. The response indicates that the information requested will be provided by the contractor implementing the RFI/RI.
67. N No changes were made to the text. The response indicates that EG&G, CDH, and EPA consider ground water monitoring to be "outside the scope of the Phase I investigation".
68. Y Appropriate changes were made to the text.

DRAFT

69. N No changes were made to the text. The response indicates that EG&G, CDH, and EPA consider ground water monitoring to be "outside the scope of the Phase I investigation".
70. N No changes were made to the text. The response indicates that EG&G, CDH, and EPA consider ground water monitoring to be "outside the scope of the Phase I investigation".
71. P The requested change was incorporated. The response indicates that EG&G, CDH, and EPA consider ground water monitoring to be "outside the scope of the Phase I investigation".
72. P The requested change was incorporated. The response indicates that EG&G, CDH, and EPA consider ground water monitoring to be "outside the scope of the Phase I investigation".
73. Y Appropriate changes were made to the text.
74. Y Appropriate changes were made to the text.
75. Y Appropriate changes were made to the text.
76. N No changes were made to the text. The response indicates that release mechanisms are covered in the second bullet.
77. Y Appropriate changes were made to the text.
78. Y Appropriate changes were made to the text.
79. P The requested change was implemented in the first occurrence of RFI/RI but not in the second occurrence.
80. N No changes were made to the text. The response is assumed to have an editing problem since it indicates that incorporation of this comment "will add to the understanding of the text". It is assumed that the word "not" was inadvertently omitted between "will" and "add" by mistake.
81. P A section on uncertainty in data collection/evaluation was included but the response shows disagreement with the other part of this comment.

DRAFT

82. N No changes were made to the text although the response indicates that the comment was incorporated.
83. N No changes were made to the text although the response indicates that the comment was incorporated.
84. Y Appropriate changes were made to the text.
85. Y Appropriate changes were made to the text.
86. P The addition of "and/or numerical" after analytical was included, but contrary to the response, the word "basic" was not deleted.
87. Y Appropriate changes were made to the text.
88. Y Appropriate changes were made to the text.
89. Y Appropriate changes were made to the text.
90. Y Appropriate changes were made to the text.
91. Y Appropriate changes were made to the text.
92. Y Appropriate changes were made to the text.
93. Y Appropriate changes were made to the text.
94. P The phrase "if a vigorous analysis is required" was deleted, but contrary to the response, detail on quantitative uncertainty analysis planned for the BRA at OU9 was not provided.
95. P The bullets for evaluating uncertainty were added to the appropriate boxes in the figure, but contrary to the response, a bullet for fate/transport modeling was not added to the exposure assessment box as the response stated would be done.

DRAFT