

COMMENT RESPONSE MATRIX

Document: Work Plan (FSP, QAPP, SSHP/RPP) for Seaway Site, Areas A, B, and C, Tonawanda, New York

Version: April 2001 Stakeholder Review Draft

Response Matrix Date: July 13, 2001

Commentator (Date of comment)	Comment No.	Reference	Comment	Response
[REDACTED] (NYSDOH) (6/15/01)	1	SSHP	We did a quick review of the sampling plan and we find it satisfactory. We just have a concern, and I'm not sure if it is addressed in the plan. It has to do the potential presence of dissolved uranium in water. We see dissolved U in the Rattlesnake creek samples. Is that addressed in the FSP or will it be a later time?	The FSP does include radiological analyses, including uranium, on the TCLP solutions. The purpose of the radiological analyses to be performed on the solution resulting from TCLP tests on the MED materials is to determine what, if any, radionuclides are dissolvable and to what extent.
[REDACTED] (6/11/01)	1	FSP/QAPP	I have looked over the Seaway Site Sampling and Analysis Plan, Volumes 1 and 2. They look fine. There was a small amount of debate on our side regarding the proposed down hole gamma logging technique, but we have determined that everything is fine. Further, we are happy to see efforts being made to determine whether there has been any commingling of foreign waste products into the MED related materials. All of the choices for analyses seem appropriate.	Comment noted.

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[REDACTED] (6/11/01)	2	FSP/QAPP	<p>It does appear, however, that data quality objectives for the radioanalytical work are still undecided. We don't view this as a major issue since isotopic analyses have been identified for use in the correlation study and those types of analyses provide the highest quality data for backing up field instrument readings.</p> <p>Again, we haven't identified any major shortcomings or oversights in the Sampling and Analysis Plan.</p>	<p>Comment noted. USACE would be willing to discuss any of the data quality objectives to assist in clarifying any concerns.</p>
[REDACTED] (CANiT) (6/7/01)	1	FSP/QAPP/SSHP	<p>I've completed the review of the documents in question and I don't have any major objection as to the contents. It is curious that the Sampling Plan and the Site H&S plan have a sign-off sheet but the QA plan does not. The one thing I noted and that isn't discussed in the Sampling plan is the shielding of the down-hole gamma detector.</p> <p>2 x 2 crystals are designed to be most efficient end-on so if they are not properly shielded so that they don't pick up what's below they will bias all readings on the high side at every measurement interval.</p>	<p>The QAPP and FSP are part of one document, the Sampling and Analysis Plan. The signature page included in the FSP is for implementation of the entire SAP and is included in the FSP per USACE guidance.</p> <p>Agree that there will be some bias at each sample interval, but this bias will have the effect of "seeing" potential elevated concentrations just prior to reaching the actual contaminated interval. A shielding detector would "see" an effective volume shaped somewhat like a doughnut whereas an unshielded detector would "see" a volume shaped more like a spherical lollipop with the lollipop stem extending down the borehole. This effective volume (bias) is acceptable as it would tend to overestimate potential contaminant volumes.</p>

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NYSDEC (5/25/01)	1	FSP/QAPP/SSHP	<p>Within this document there are several references as to how the borings will be constructed, some of which are not the same. An in-depth discussion should be presented as early as possible to avoid conflicts within the various discussions. For example, the first reference to borings in Section 1.3.1, subsection 1, <u>Correlation Study Effort</u>, should refer to a section which discusses the construction of the borings. The next reference, in subsection 2, <u>Determine Extent of Contamination in Areas B and C (Phase I)</u>, says that all borings will be constructed in the same manner and goes on to say the Rotasonic drill rig will be used to bore a hole 4 inches or larger and then a 4-inch PVC pipe will be placed in the hole prior to performing the in-hole gamma logging. In Section 2.2.2.1, <u>Field Measurement Procedures and Criteria</u>, the second sentence states, "The Rotasonic boreholes will be drilled and cored simultaneously advancing two lines of drill pipe, a 4-inch inside diameter inner core barrel and a 6-inch inside diameter outer drive casing." All discussions should be placed in one area which completely describes the installation of the boring.</p>	<p>The borehole design is relatively simple. A hole large enough for a 4-inch PVC pipe to be placed down in it will be drilled and the pipe put in place. The manner in which the PVC pipe will be placed is dependent on the drilling depth, the drilling company and their procedures as well as which is the most efficient procedure based on field conditions. For example, if the hole is only five feet, it may be simpler to drill the hole and then place the PVC pipe down the hole manually. Deeper holes may require use of mechanical devices. The intent is not to be restrictive on how the holes are constructed since all that is necessary is a hole with the PVC pipe placed down into it.</p> <p>The specifics referenced in Section 2.2.2.1 are discussing how the drilling company advances the hole and provides a core that is then extruded and used for obtaining samples at intervals to be determined in the field. This discussion is not on the borehole construction that is needed for the in-hole gamma logging, it is for stating how the core that will be sampled is collected.</p> <p>Recommend no changes to the document.</p>

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NYSDEC (5/25/01)	2	FSP/QAPP/SSHP	<p>Within this document, there are several references as to how the borings will be field measured. Several of the discussions should be merged into one section. For example, in Section 2.2.2.1, <u>Field Measurement Procedures and Criteria</u>, the last sentence of the second paragraph states, "Measurement of both alpha and beta-gamma radiation will be recorded for each core sample for health and safety purposes." In the next subsection, <u>Field Measurements</u>, the first paragraph goes on to discuss the scanning of the core with a 2x2 NaI detector. In another section, 2.2.2.2, <u>Sample Collection for Laboratory Analyses</u>, the first sentence states, "After retrieval, the soil core will be placed on a table covered by clean plastic sheeting. Cores will be removed from the core barrel (if a core barrel is used), measured and examined." All these ideas should be stated in one section describing how a core is to be handled in a step by step fashion, because even though the alpha, beta-gamma survey is for health and safety purposes, it will still provide valuable information for other purposes. Likewise, the work being performed on a table is an important factor, as the core is further removed from potentially contaminated surface soils. It should be also mentioned that this table will be set up in an area with no identified surface contamination.</p>	<p>Agree that discussion on radiological scans should be consolidated and stated clearly to avoid confusion. A description of the 2X2 scans has been added to the end of the second paragraph of Section 2.2.2.1. Likewise, the text under Field Measurements has been clarified to be consistent.</p> <p>While it is important to limit influence that surface contamination may have on scan readings, it may not be possible to eliminate all influence without moving a significant distance from the drilling area. While efforts will be made to avoid placing the table in a contaminated area (to avoid cross-contamination, to limit the need for decontamination and control of unnecessary waste, and keep with ALARA principles), it is a good practice to check local detector background concentrations prior to recording readings. That is, the local background (e.g., at the table) may be significantly higher or lower than the value recorded where daily source checks are performed. For the field data to be most useful, analysts need to know a detector's response above local background. A sentence has been added after the second paragraph of Section 2.2.2.1 to state that local background concentrations will be documented for each location that detector readings are recorded.</p>

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NYSDEC (5/25/01)	3	FSP/QAPP/SSHP	On page 2-2, there is a description of the reference boring. The location of the reference boring must be beyond any radioactive influence.	The reference boring is to be located in an area of the landfill between Areas B and C where MED-related materials have not been disposed of based on the historical records. The intent is to locate it such that there are no MED-related materials present and that the radiological readings associated with the landfill materials that are not MED-related can be measured and used as a reference value. Reference boring data will be reviewed as soon as practicable to assure that MED-related materials do not bias reference data.
NYSDEC (5/25/01)	4	FSP/QAPP/SSHP	On page 2-8, it is noted that not all borings will have soil sampling. Please identify which ones will not and explain why.	In developing the overall sampling strategy for the Seaway Field Effort, the Technical Project Planning TPP session involving key stakeholders (e.g., NYSDEC, NYSDOH, EPA, CANiT, etc.) identified that only the correlation borings, the reference boring, the additional borings in Area A, and the biased-location borings in Areas B and C would be sampled and analyzed. The remaining borings were for determining the extent of contamination based on remote sensing measurements and therefore rely on a pass or fail reading using the in-hole gamma logging procedures.
THE END				