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|---|---|
| **From:** | Frank DeVita |
| **To:** | Similo, Ashley; Dudek, Heidi M (DEC) |
| **Cc:** | Badalamenti, Salvatore; Burke, Gerard (DEC) (gerard.burke@dec.ny.gov); Myralee S. Machol (mmachol@glencovecda.org); Ellis Koch; James Van Horn |
| **Subject:** | 3398: RE: EPA comments on FSSR |
| **Date:** | Tuesday, May 05, 2015 3:01:20 PM |
| **Attachments:** | removed.txt |

This message contains attachments delivered via ShareFile.

- Li Tungsten FSSR Response to Comments 040615.pdf (177 kB)
- Li Tungsten FSSR Rev 1- 040615.pdf (8.6 MB)

Download the attachments by clicking here.

Ashley/Heidi –

Enclosed for your review please find a copy of the revised FSSR prepared by the Development Team addressing comments provided as summarized the e-mail below. Should you have any questions or require any additional information please do not hesitate to contact me at (516) 364-9890 Ext. 3064. Thanks again.

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AND
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**From:** Similo, Ashley [mailto:Similo.Ashley@epa.gov]
**Sent:** Thursday, March 19, 2015 12:43 PM
**To:** Myralee Machol
**Cc:** Dudek, Heidi M (DEC); Badalamenti, Salvatore; Frank DeVita
**Subject:** EPA comments on FSSR

Myralee,

EPA has reviewed the FINAL STATUS SURVEY REPORT (FSSR), PARCEL A, PARCEL LOWER C AND PARCEL UPPER C, REV 0, Feb 2015. Please see comments below. As a FSS report the first comment must be addressed or questions will continue to rise about the actual status of the parcel in question.

1. Significant - Section 4.2.1 and section 6 - MARSSIM guidance is that if contamination above the criteria is found in a class 2 survey unit the survey unit should be reclassified. As discussed in section 4.2.1 contamination was found above the criteria but no discussion of additional sampling or survey unit reclassification is presented. As currently written, insufficient evidence is presented to fully address the survey unit within the standard industry approach to final status surveys (MARSSIM). At a minimum a review of survey unit classification and data quality objectives should be discussed indicating why the entire survey unit was not reclassified. It is typical to resample an area after remediation, was this done, present the final status sample results or other information that demonstrates the remediation was complete.

2. Assuming comment 1 is adequately addressed, the survey effort appears to have been completed in accordance with the plan and industry guidance. The documentation of the effort in this report however, provides for future questions and risks which can be mitigated by addressing the below specific comments. None of the below comments are individually significant but combined they lead to additional future risk and remaining liability.

2a. Section 4.1.1, Table 4-1 - The table footnote suggests that the assumed background counts is conservative, yet the Table 4-2 data suggests it may not be conservative. Address this discrepancy by deleting the conservative parenthetical, discussing as a pre survey calculation, referencing background area scan data, and/or by using the Table 4-2 values to determine actual scan MDC as well.

2b. Section 4.1.1 The last sentence states that the criteria was reduced by 50% to account for the low gamma emissions from Ra-228 and Th-230. It would be better stated simply that Ra-228 is a daughter of Th-232. OR that combined the gamma emissions of Ra-228 daughters presents a gamma signature approximate of that of Ra-226 thus accounted for by the 50% reduction. The Th-230 is another issue. Unless we know the Th-230 is equal to the Ra-226 or know the ratio between them, the 50% reduction seems arbitrary. Additional language should be added to defend this reduction (equilibrium between Th-230 is assumed [per section 5] and proven by sampling, etc.)? Alternatively, a discussion of why additional sample locations were not needed to address the lack of Th-230 scanning could be presented. The limited results above the investigation level and criteria could also be used to defend the approach taken.

2c. Section 4.2.3 and section 6 states "Since no single sample within the six survey units exceeded the established release ...." however we demonstrate in section 4.2.1 and table 4-3 that a sample did exceed the criteria. Address this discrepancy by stating "Since no "systematic" sample within the six survey units exceeded the established release ....".

2d. Table 4-3 - Recommend deleting the bias result as it does not represent the final status of the survey unit since it was remediated. Do we have a replacement sample result? Amend bias sampling discussions accordingly. Figure 4-1 (SU-1) appears to show several non systematic sample locations which are not presented in the table. Change figure or table accordingly.

2e. Tables 4-3 to 4-8 - Although mentioned in section 5 footnote the tables to explain that only 5% of samples were analyzed for Th-230. Note that in section 5 we say we took samples to confirm

assumption of equilibrium but we do not say if they actually confirmed it or not.

2f. Section 5. Was data validated? Discuss results of validation or reasoning why it was not done. Attach any Data Quality Summary Reports as an appendix. At a minimum discuss the PARCC parameters and outcome of evaluation.

2g. Recommend an executive summary be added.

Please contact me if you have any questions, and forward to whoever necessary.

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