Summary of EPA comments on the "Bridgeton Landfill – West Lake Landfill Gamma Cone Penetration Test (GCPT) Work Plan, July 25, 2013", submitted as part of the second Bridgeton Landfill contingency plan for the SSO.

General Issues:

1. The array of proposed geoprobe locations should to be extended to the southeast all the way to the perimeter fence around OU1 Area 1, to ensure that if the barrier is built in the currently proposed location, there is no chance of radiological material being on the "SSO side" of the barrier. If elevated gamma readings indicative of radiological material are encountered along the fenceline, the geoprobe locations should be extended outside the fence until the perimeter of the elevated gamma readings is fully determined.

2. The efforts to calibrate the GCPT gamma sensor against the historic gamma log data in OU1 Area 1 should include one or more locations of low and/or intermediate gamma readings, not just background locations and PVC-38 which has high historic gamma readings. In this way the GCPT can get a measure of a slightly impacted rad area just above background.

3. Disposal of decontamination water from the decon pads by discharging it to the ground surface should not be allowed. The PRPs should have to containerize, characterize and properly dispose of this water.

4. A response check of the GCPT instrument should be considered at the beginning and end of each day to verify the detector's response.

Specific Issues:

1. Section 2: In the first sentence, "high-quality" should probably be replaced by "high-density" or a similar term so that the quality of the existing data is not called into question.

2. Section 2.1: The number of radionuclides discussed here is not clear; the text says eight but only seven are listed.

3. Section 3.2.1.3: The "scanning" of the probe rods mentioned here should be described better.

4. Section 3.3.1: The methodology for the overland gamma survey should be discussed here. Also, in the third paragraph, "truck" should be "trunk" when discussing tree diameters.

5. Section 3.3.2: In selecting geoprobe locations, surface debris should be avoided rather than moved, if field conditions allow. Also, the workplan does not specify what will be done if any relocated rubble is radiologically contaminated.

6. Section 3.3.4: The radiological and non-radiological decon pads have not yet been described in the document by the time the reader gets to Section 3.3.4. In fact, decon issues are described in several locations in the document; they should be consolidated.

7. Section 3.3.4: Probe holes should be filled with bentonite in short hydrated lifts to insure the material expands properly, rather than filled to the top with dry pellets and then hydrated.

8. Section 3.3.4: The cutoff radiation level distinguishing the presence of RIM from the absence of RIM should be explicitly defined here. This is relevant for decontamination as well as clearing this area for installation of the trench, if necessary.