



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10 HANFORD/INL PROJECT OFFICE  
309 Bradley Boulevard, Suite 115  
Richland, Washington 99352

October 19, 2009

Matthew S. McCormick, Assistant Manager  
for the Central Plateau  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

Re: BC Cribs and Trenches Excavation-Based Treatability Test Report, DOE/RL-2009-36,  
Draft A

Dear Mr. McCormick:

The United States Environmental Protection Agency (EPA) is conditionally approving the above-referenced document pending the incorporation of EPA comments.

EPA agrees with the Department of Energy (DOE) in its assessment that sufficient data have been collected to update the existing feasibility study and proposed plan. The refined estimates of worker dose, as well as the conceptual site model and additional waste site characterization and cost data, will enable DOE to prepare much more technically refined products.

Please feel free to contact me at (509) 376-3749 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Rod Lobos", written over a horizontal line.

Rod Lobos  
Remedial Project Manager

Enclosure

cc: John Price, Ecology  
Admin. Record: 200-BC-1

**RECEIVED**  
OCT 22 2009  
**EDMC**

**EPA Comments on BC Cribs and Trenches Excavation-Based Treatability Test  
Report, DOE/RL-2009-36, Draft A**

Page 1-1 1.1 Issues

EPA/DOE disagreement over initial FFS/PP was left out. Implementability and short-term effectiveness of the evaluated remedies was a point of contention because of the elevated worker dose estimates.

Page 3-19 3.2.3 Lessons Learned and Discussion

The addition of using the magnetically adhered lead impregnated silicone rubber shielding on the side of ERDF containers should be added to the recommendations.

The use of additional shielding when needed would facilitate filling of the ERDF containers by making the mixing not so crucial and time consuming as a hot spot just over transportation limits could be remedied by application of the additional shielding.

Page 3-22 3.3.2 Results

Please note the top and bottom elevations and depths from ground surface of the crib structure in the narrative.

Page 3-22 to 3-29 3.3.2 Results

The data from 299-E13-1 is inconsistent with the rest of the boreholes. Potential theories of why this data is so different are not explained (i.e. preferential path, clastic dike, borehole installation technique, etc.). Please explain why this data does not follow the trend of shallow pushes.

Page 4-1 4.1 Conclusions, first bullet

The potential dose to workers was generally "less than half" than was predicted in the FFS.

Page 4-1 4.1 Conclusions, last paragraph

Excavation of the remnant crib structure is the only way to completely remove all potential for subsidence as completely removing all voids with controlled density fill for this type of structure would be very difficult. Excavation of the structure should be added to the text.