



U.S. ENVIRONMENTAL PROTECTION AGENCY
HANFORD PROJECT OFFICE
825 Jacwin Ave., Suite #210
Richland, WA 99352

May 6, 2015

Ray J. Corey
Assistant Manager for the
River and Plateau
U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, WA 99352

Re: EPA Comments on the Integrated Remedial Design Report/Remedial Action
Work Plan for 100-F/IU, DOE/RL-2014-44, Draft A

Dear Mr. Corey,

This letter transmits EPA comments on the above-referenced document. If you have any questions, feel free to contact me at guzzetti.christopher@epa.gov or (509) 376-9529.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Guzzetti", written over a printed name and title.

Christopher Guzzetti
Project Manager

Enclosures

cc (electronically):

Greg Sinton, DOE
Gabe Bohnee, Nez Perce Tribe
Stuart Harris, CTUIR
Russell Jim, Yakama Nation
Steve Hudson, HAB
Nina Menard, Ecology
Ken Niles, ODOE
Administrative Record (100-FR-1, 100-FR-2, 100-FR-3, 100-IU-2, 100-IU-6)

EPA Comments on the Integrated Remedial Design Report/Remedial Action Work Plan for 100-F/IU

#	Page	Line/Figure	Comment
1	General	General	EPA expects that a Change Notice will accompany the Final RDR/RAWP when it comes over for signature to add a milestone for completing the Phase 1 well installation by the end of FY 2016 (according the schedule described in Section 7.2 and Figure 7-1 of the GW Addendum).
2	General	General	Throughout the entire document, the use of the acronym "CUL" is highly inconsistent. The integrated WP section of the document and the GW Addendum use it constantly while the Soil Addenda uses it sparingly. Pick one and be consistent (EPA would prefer that it is just spelled out instead of creating another acronym).
INTEGRATED RDR/RAWP SPECIFIC COMMENTS			
3	1-1	14	Capitalize "river corridor" ?
4	1-6	3-4	Delete. Already stated this on page 1-1
SOIL ADDENDUM SPECIFIC COMMENTS			
5	1-4	Table 1-1	Delete "ROD = Record of Decision" from bottom of table since the term is not used in the table.
6	2-1	Last paragraph	Capitalize "river corridor baseline risk assessment" ?
7	4-8	Section 4.4.3	Change "Collocate" to "Co-located" ?
8	5-8	Section 5.3, Second Paragraph	Spell out "AOC" for first use
9	5-9	5.4.3, third bullet	Spell out "SPA" for first use
GROUNDWATER ADDENDUM SPECIFIC COMMENTS			
10	1-1	3	Capitalize "river corridor" ?
11	1-3	17-18	Would be helpful to the reader to reference the Section number as well.
12	3-1	Table 3.1, third column, fourth row	The timeframe listed for the Five Year Review is incorrect. The FYR was completed in 2011 so the next one (Fourth FYR) will be completed in 2016, the Fifth FYR will cover the years from 2016 to 2021.
13	3-10	28-29	Incorrect.(see comment above). Fourth FYR – 2011-2016, Fifth FYR – 2016-2021
14	6-2	Table 6-1, first row, first bullet	Change "Phase I" to Phase 1 for consistency.
15	6-4	18-19	"as needed" ?? Plume maps are generated annually for the Annual GW Report correct?
16	6-7	14	Suggest just spelling out CI instead of creating another acronym.
17	6-8	Section 6.4.1	This section is the perfect example of why the preference for not using the CUL acronym and just spelling it out. Having CUL, UCL, and LCL in the same section makes it difficult to follow.
18	6-8 and 6-9	Section 6.4.2	Once all wells have completed the attainment monitoring phase, is there a final sampling event of all wells to confirm RA

#	Page	Line/Figure	Comment
			completion? If not, suggest that this step is added in to the process so that confirmation is obtained especially for those wells that reach attainment early on in the process.
19	6-9	28	Spell out confidence levels, do not make another acronym.
20	5-3	13-14	Incomplete sentence, should end like this? "....described above."
21	A-4	1-2	This statement is really confusing. GW migrating from 200 Area has always been said to not be part of 100-FR-3 but this is the first time "upgradient contaminated groundwater from other areas, including other 100 Areas" has been mentioned. Please explain.
22	A-4	7-8	Is included where? Reference the section.
23	A-5	26-27	These statements are confusing, and the use of the word "probably" is bothersome especially since the next paragraph (lines 28-32) seems to provide more information on vertical gradients. Please clarify.
24	C-7	36-37	Who at EPA has agreed to this? Can you provide the documentation where EPA has agreed or approved of this?