



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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47480

June 27, 1997

Robert K. Stewart
CRCIA Project Manager
U.S. Department of Energy
P.O. Box 550 H0-12
Richland, WA 99352

RE: EPA Comments on "Screening Assessment and Requirements for a Comprehensive Assessment: Columbia River Comprehensive Impact Assessment", DOE/RL-96-16, Rev. 0, Draft of April 1997

47249

Dear Mr. Stewart:

Enclosed are the U.S. Environmental Protection Agency's comments on the subject document. If you have any questions please contact me at (509) 376-9884.

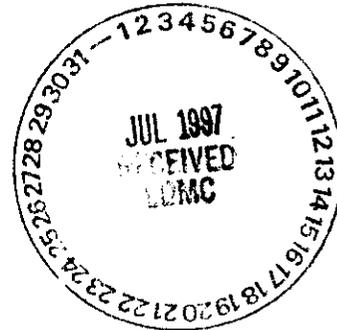
Sincerely,

Laurence E. Gadbois

Laurence E. Gadbois
CRCIA Project Manager

Enclosure.

cc: Peter Bengston, Oregon DOE
Paul Danielson, NPT
Greg deBruler, HAB
Roger Dirkes, PNNL
Sue Finch, PNNL
Dave Guzzetta, GSSC
Stuart Harris, CTUIR
David Holland, Ecology
Tom Woods, YIN
Administrative Record: CRCIA



**EPA Comments on "Screening Assessment and Requirements
for a Comprehensive Assessment:**

Columbia River Comprehensive Impact Assessment"

DOE/RL-96-16, Rev 0, Draft of April 1997

EPA's comments are divided into two categories. First are substantive comments that should be processed along with other reviewers' comments and included in the final document. Second are editorial comments that should not be included in the final document.

Substantive Comments

Page, Paragraph	Comment
page xi, 4th paragraph	The first page of the executive summary repeatedly identifies Tri-Party agreement milestones by number. If the milestones in fact have any value to the reader, it is the content of the milestones that could be of value, yet the actual text of the milestones is not provided. If milestones are included in the rewrite of this document, a table should be added that contains the actual text of the milestones.
page xvii, 1st paragraph	Change to read "with single high upper end values of the parameters to identify potential worst case results for reasonably maximum exposed individuals".
page xvii, 1st sentences of 2nd and 3rd paragraphs	The document states "For the human health assessment, both deterministic and stochastic calculations were performed for all contaminants, all scenarios, and all river segments", and "For the ecological risk analysis, deterministic calculations were performed for all species/contaminant/segment combinations". Not true.
page xvii, 6th paragraph	The document states "As a result of Hanford Site operations as well as from other human activities upstream of the Hanford Site, environmental levels of some contaminants do appear to be elevated". This assessment did make comparisons of Hanford Reach conditions relative to upstream and can make statements regarding elevated concentrations. This assessment did not do a significant comparison of upstream conditions with other reference conditions to enable making statements regarding elevated upstream conditions.
page xxvii, "copper"	In table S.1, copper is identified as a potential ecological risk in segments 4 and 20. However on page xxvii, only segment 4 is mentioned.

page xxxii, 4th paragraph	Suggest changing "This is the only composite assessment of how effective the cleanup..." to "This is the only defined set of requirements for composite assessment of how effective the cleanup...". Note Part II is not a composite assessment -- it is a set of requirements for a composite assessment.
page xxxii, text box	This text box is far more Hanford jargon-filled than the text it is supposed to be clarifying. Examples: "TPA milestones M-15-80A...M-15-80B-T01" and "multi-year work plan packages for FY". This should be simplified.
page I-4.47, table 4.23	This table presents an evaluation of how the models performed relative to published data for several categories of animals and for several contaminants. How did the model do for the rest of the species and the contaminants? Why are the performance results for only part of the model presented?
page I-5.8, last paragraph	This document indicates that an air inhalation of 10 m ³ was used rather than 20 m ³ as outlined in HSRAM. The HSRAM values should be used.

Editorial Comments

Page, Paragraph	Comment
page viii, 4th paragraph	Change to read "...release of hazardous chemicals and radionuclides to the Columbia River and into the soil soil and groundwater ".
page ix, 5th paragraph	Change to read "Finally the scenarios to be studied scenarios to be used were selected or developed ". The CRCIA was not to study scenarios but rather to use or develop scenarios as tools to assess the River.
page ix, 6th paragraph	Replace S.D. Cannon with Sandra Cannon. Generally when people call someone on the phone, the caller would like to know the name of who they are calling, not just initials.
page xii, last bullet	"radionuclides, carcinogenic chemicals, and toxic chemicals" should be changed to "radionuclides, and non-radionuclides".
page xiv, 2nd-3rd paragraphs	The initial list of "100" potential contaminants should be changed to "560" potential contaminants as stated elsewhere in the document.
page xvi, 1st paragraph	The sentence "Near river groundwater was used as a surrogate for riverbank seep water in those segments not having any results on the seep water itself" needs to be moved from this paragraph, as it is not part of the paragraph topic. The idea is already expressed in the following paragraph in a more succinct form.

page xxxi, 2nd paragraph	"Many contaminant metals tend to sorb...". "A clear understanding of the these complex...".
page xxxviii, "bioconcentration factor"	The definition needs to be broadened such that, for example, it also applies to plant uptake of Tc in the riparian zone.
page xxxix, "dose"	"Dose" also applies to non-radiological contaminants.
page xlvi	Need to add the term "species".
page I-iii	Icon needs to change to match the rest of part I.
page I-3.1, 1st text box, 3rd bullet	Change "27 segments (areas) along the Hanford Reach of the Columbia River" to something like "27 segments (areas) along the Columbia River including the Hanford Reach and downstream to the first (McNary) dam".
pages I-4.36 and I-4.37, figures 4.4 and 4.5	The reproduction quality of these two figures is unacceptable poor compared to the rest of the document. Faded text and excessive shading make parts of it almost unreadable. These should be redone.
page I-4.67, 2nd paragraph	Typographical error: "provide data for the this study".
page I-4.79, 4th paragraph	The paragraph that begins "Aquatic species..." is an excellent summary of the results. Good writing.
page I-5.4, 1st paragraph	Change to read "and a residential scenario and an agricultural resident scenario".
page I-5.7, 2nd paragraph	The paragraph that begins "The lifestyle of..." is excellent. Demonstrating how scenarios can be pieced together greatly adds to the utility of this document.
page I-5.14, 1st paragraph under "Ranger"	Should change to read "administration of Hanford as a wildlife refuge would is assumed to be handled".
page I-E.4, figure E.2, second figure	The legend was not filled in.
page I-6.12, 1st paragraph	Typographical error: "All postulate individuals who spend".