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Comments on the Draft EE/CA for the 232-Z Building

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EDMC

General Comments

I commend the authors on the quality and completeness of this draft EE/CA. Excellent descriptions of the facility, the wastes to be dispositioned, and the proposed disposition activities were provided. My only real complaint is that the second and third alternatives are different only in the waste disposal costs, which arise from the peculiar disposal cost structures at the LLBG and the ERDF, and thus do not really represent two alternatives for the disposition of the structure. A better choice for the third alternative might be to remove the structure as in Alternative 2 plus removing the slab and the below-grade portions, and decontaminate the soils under and immediately around the structure, instead of pouring a cap on the slab.

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With this EE/CA and the one for the 224-B building, a pattern is starting to appear, i.e., tear down the small buildings but leave disposition of the below-grade materials to some as yet undefined future program for final clean-up of the whole area. There ought to be some master plan/schedule for disposition of the large population of relatively small structures in the 200 Areas, and for the final below-grade clean-up that would follow the disposition of the canyon buildings. Otherwise, one has the uneasy feeling that the old out-of-sight, out-of-mind syndrome might in the end be applied to these below-grade sources. If such a master plan does exist, it should be mentioned and referenced in these EE/CAs.

Specific Comments

Add an executive summary which would include the present introductory material, identification of the considered alternatives, the proposed schedule for these activities, and a brief summary table that contains the estimated costs, risks, types and volumes of wastes arising from the alternatives, and indicate the selected alternative.

Add a map in Section 2.1 that illustrates the location of the 232-Z building relative to other 200 Area facilities significant to these activities, e.g., 234-5 Z, 291-Z, ERDF, LLBG, etc.

Add a figure in Section 2.2 that illustrates the building plan view and vertical section view, showing the locations of the remaining process glove boxes, ventilation ductwork, etc.

The last sentence of the next to last paragraph of Section 4.2 says "These activities will commence in fiscal year (FY) 2003", which closed at the end of September of 2003. Do you mean to say FY 2004?