

**Isom, Debra A (Debbi)**

**From:** Boyd.Alicia@epamail.epa.gov  
**Sent:** Tuesday, February 07, 2006 10:51 AM  
**To:** Isom, Debra A (Debbi)  
**Subject:** Fw: 300 Area EECA #2 comments

**Attachments:** EPA Comments on EECA #2.doc



EPA  
 s on EECA #2

Debbi

Please add this forwarded e-mail to the administrative record. It contains my comments on the first draft of 300 Area EE/CA #2, which concerns the 300-FF-2 operable unit.

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----- Forwarded by Alicia Boyd/R10/USEPA/US on 02/07/2006 10:47 AM -----

Alicia  
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01/05/2006 04:35  
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To  
 "Guercia, Rudolph F (Rudy)"  
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cc

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Subject

EECA #2 comments (Document link:  
 Alicia Boyd)

Rudy

Here are my comments on EE/CA #2. Call me if you want to discuss them or if you need any further clarification.

(See attached file: EPA Comments on EECA #2.doc)

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## EPA Comments on EE/CA #2

### **General**

Please add a short description of what the assumptions were concerning hot cell removal. The 324 cell removal must be a large portion of the estimated D4 cost of the 324 building. I'm not asking for anything fancy, or any particular commitments to a particular removal method. Something along the line of "For cost estimate purposes, the assumption is that each hot cell will be removed in one piece, stabilized, and transported to ERDF" would be acceptable.

The use of D&D and/or the phrase Deactivation/D&D is inconsistent with the intended meaning. The use of these phrases entirely skips the idea of demolition. I could read that the entire EE/CA did not include a cost estimate or evaluation of the actual building demo. I suggest that you either switch to using the D4 term (which at least addresses all D's) or spelling out separately deactivation, decontamination, decommissioning, and demolition. The use of "deactivation/D&D" is frequent (I'd guess at least 30 times throughout the document). It'll take some time to search and destroy all of them.

Why isn't the 3727 building included in this EE/CA? It is geographically close to the 324 building and it overlies the 316-3 candidate waste site. Both seem to be the reasons other buildings were included in this EE/CA.

#### **1.2.1**

1<sup>st</sup> paragraph, 1<sup>st</sup> sentence – the record of decision (ROD) for the 300-FF-5 OU is an *interim* ROD. Please make sure to note whether RODs are final or interim.

2<sup>nd</sup> paragraph, 1<sup>st</sup> sentence – please list the other contaminants of concern and COPCs.

#### **1.2.2**

Last sentence – the milestone table is 1-3.

#### **1.2.3**

1<sup>st</sup> paragraph, 1<sup>st</sup> sentence – There are no longer 220 facilities in the 300 Area Complex. Feel free to say that there once were 220 facilities there. But please also give an approximate number of facilities existing at the writing of the EE/CA, or at the beginning of calendar year 2006. The fact that some of the building foundations remain even though the buildings have already been removed.

3<sup>rd</sup> paragraph, last sentence – Sentence fragment "The Removal Action Work Plan #1" was probably left over from cut and paste.

4<sup>th</sup> paragraph, last sentence – milestones table is 1-3.

#### **1.4**

1<sup>st</sup> paragraph – please add in milestone M-16-69 as it is more of a schedule driver than M-94-00 is. They both have the same due date, but obviously buildings need to be down before waste sites below can be remediated.

1<sup>st</sup> paragraph – Please don't mention the RCRA closure plan. If you absolutely must mention it, don't state that it requires anything by 2010. You could say that it is being updated with the intention of closure by 2010 but don't anticipate the change. We will be going to public comment before any of that is final. Just skip mentioning it if you can.

#### **Figure 1-2**

Please show one of the maps that labels the outlying waste sites and burial grounds.

#### **Figures 1-3 and 1-4**

Labels are incorrect. Picture of 327 is labeled 324 and vice versa. Make sure to address this in the table of contents as well.

#### **2.1.2**

2<sup>nd</sup> paragraph, last sentence – the industrial land use assumption is not actually consistent with all of the following documents. You could change the statement to “consistent with most of the following documents” or something like that. The City of Richland study cannot be considered consistent with the industrial use scenario.

#### **2.2.1**

324B Stack – Is it 4.6-m or 150 feet high? One of those needs to be modified.

#### **4.2.2**

3<sup>rd</sup> paragraph – Put EPA approval back in for the decision to defer foundation removal to the remedial project.

Last paragraph, 1<sup>st</sup> sentence – what does “final facility closure” entail? Please explain.

#### **4.3**

1<sup>st</sup> paragraph, last sentence – once again you refer to the 324 closure plan having a current deadline of 2010. Don't bother adding this because I think it says enough to state that the milestone requires the building to be gone by 2010.

#### **4.4.1**

3<sup>rd</sup> sentence – please explain what the mitigation was.

#### **4.4.2**

Last paragraph – The language here needs to reflect that this action covers that final disposal pathway. CWC or other temporary facilities that coordinate such things are not considered a final disposal. The Action Memo has better language that covers this subject on page 12.

#### **5.4.1**

1<sup>st</sup> paragraph, 4<sup>th</sup> sentence from the end – I don't know if you can truthfully say that most waste transportation will occur "primarily on roads where public access is restricted". From a map it looks pretty even what is within the guard station boundaries and what is still considered State Route 4. Unless you're planning on relocating the restricted area, please reword this section.

#### **Figure 7-1**

I think this is supposed to be a fiscal year based calendar. Please note this appropriately or change the scale to calendar years.

#### **A.2**

Last sentence – mentions previous documentation in Section 4.0. I believe you were referring to section 5.1.1.